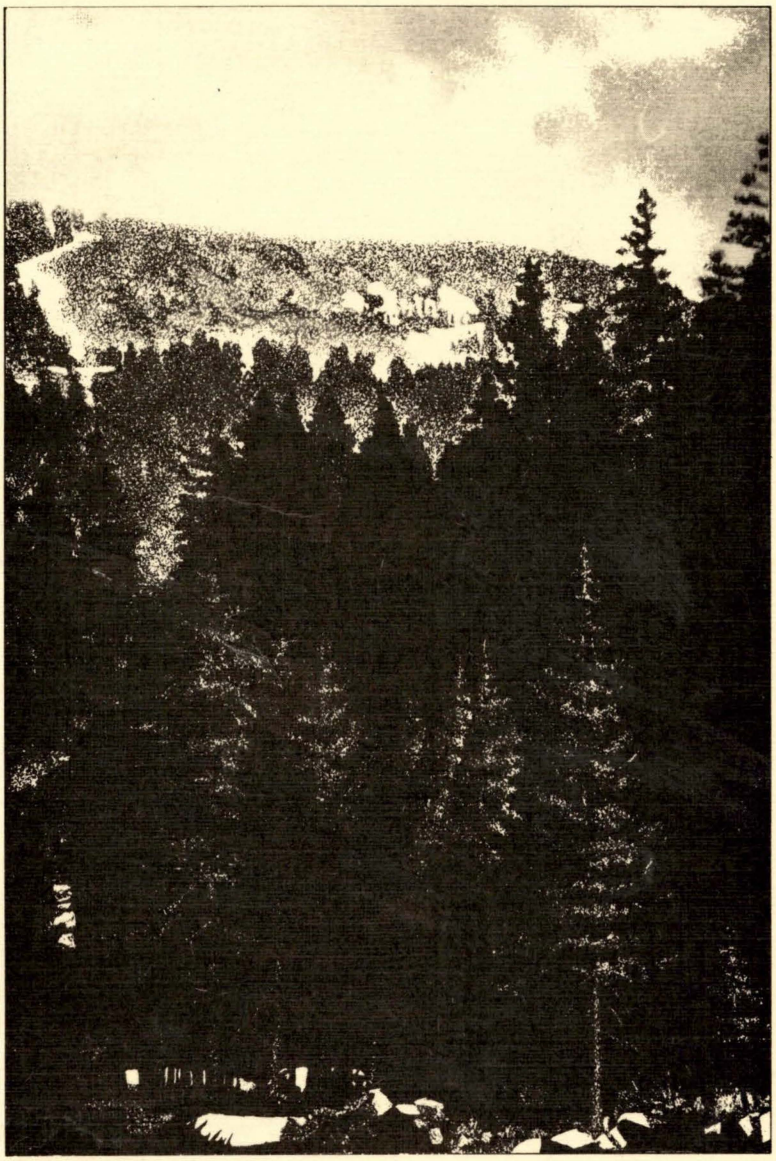
United States
Department of
Agriculture

Forest
Service

Pacific
Southwest
Region

RECORD OF DECISION

Final Environmental Impact Statement
Sugar Bowl Ski Resort Master Plan



Tahoe National Forest

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Date: JUL 2 7 1992

TO ALL THOSE INTERESTED IN THE RECORD OF DECISION
FOR THE SUGAR BOWL MASTER PLAN
FINAL ENVIRONMENTAL IMPACT STATEMENT:

I am enclosing a copy of the Record of Decision for the Final Environmental Impact Statement (Final EIS) for the Sugar Bowl Ski Resort Master Plan. As it relates to development and use on National Forest System lands, my decision is to adopt the Preferred Alternative, Alternative 3A, as identified in the Final EIS. The Preferred Alternative provides for the construction of three new chairlifts on Mt. Judah and replacement of the existing Disney lift to provide a total resort capacity of 5,780 skiers.

The Final EIS was circulated for public review from May 15, 1992, through June 15, 1992. This review generated 11 public and agency responses. Our response to those letters is included in the Record of Decision.

The Environmental Impact Statement, Technical Appendices, and Record of Decision are available for public review at the Truckee District Office and the Forest Supervisor's Office at 631 Coyote Street in Nevada City, California. These same documents are available in the Placer County Library, Auburn; the Nevada County Library, Nevada City and Truckee; Robert Crown Law Library, Stanford; and the Donner Summit PUD office, Soda Springs.

This decision is subject to appeal pursuant to 36 CFR 217. I encourage anyone who is considering an appeal to consult with me prior to submitting their appeal notice to see if their concerns can be resolved.

Again, I thank you for your participation and efforts to share your concerns. I hope you will continue to actively participate in National Forest planning in the future.

Sincerely,

John H. Skinner

JOHN H. SKINNER
Forest Supervisor

Enclosure

RECORD OF DECISION ** USDA-FOREST SERVICE

Final Environmental Impact Statement
Tahoe National Forest
Sugar Bowl Ski Resort Master Plan

Nevada and Placer Counties, California

I. DECISION

As it relates to development and use on National Forest System lands, it is my decision to adopt the Preferred Alternative (Alternative 3A) as presented in the Final Environmental Impact Statement (Final EIS). The Preferred Alternative is a modified version of the Master Plan originally submitted by Sugar Bowl Corporation and a modified version of Master Plan Alternative 3 as presented in the Draft Environmental Impact Statement (Draft EIS). Exhibit "A" depicts the Preferred Alternative.

The Preferred Alternative provides for the construction of three new chairlifts on Mt. Judah and improvement of the existing Disney lift to provide a total resort Comfortable Carrying Capacity of 5,780 skiers. A new Mt. Judah day lodge would be constructed and parking facilities would be provided just west of the existing day lodge. The new base facilities would be connected to Donner Pass Road by a new access road. Under the Preferred Alternative, chairlifts, ski trails, day lodge, access road, parking facilities, and construction/service road have been relocated to avoid or reduce impacts on wetlands, the Coldstream and Roller Pass segments of the Truckee Route of the Overland Emigrant Trail, the Pacific Crest Trail, and other environmental or historic features. The Preferred Alternative also includes night skiing as a traffic mitigation feature and the construction of the Mt. Judah Loop Trail as a Pacific Crest Trail mitigation.

In addition to my decision to select the Preferred Alternative, I have decided to proceed with the process that will amend the Tahoe Land and Resource Management Plan (LRMP) direction described in the Tinkers Management Area, MA 71, for the headwaters of Coldstream Canyon. That analysis, to be documented in a separate assessment, will focus on the need to change the management direction for the headwaters of Coldstream Canyon from "available for future consideration for downhill ski development" to manage the area for "dispersed recreation emphasis."

II. COMPATIBILITY WITH GOALS AND PLANS OF OTHER AGENCIES

The proposed expansion of Sugar Bowl will require permits from Placer and Nevada Counties which have permit authority over proposed access roads, the parking area, and other facilities on private property. The Preferred Alternative is consistent with the General Plans for both Placer and Nevada Counties.

The counties are required by state law to review the proposal and to assure compliance with the California Environmental Quality Act (CEQA). The Placer County Permit Streamlining Committee found that an Environmental Impact Report (EIR) would be required and agreed in April, 1990, to use the Final EIS as an EIR pursuant to Article 14 of the CEQA guidelines. Therefore, the environmental documents were developed cooperatively with the respective counties in accordance with Council on Environmental Quality Regulations 40 CFR Parts 1500-1508, section 1506.2 entitled "Elimination of Duplication with State and Local Procedures." The purpose of this section of the regulations is to encourage federal agencies to cooperate with state and local agencies to conduct a joint planning process with the objective of reducing duplication.

The Forest Service and the project EIS consultant have been in continuous consultation with Placer County administrators and staff to assure that County concerns have been addressed in both the Draft EIS and Final EIS. Similarly, there has been repeated consultation with administrators and staff of Nevada County, primarily with the Department of Transportation.

III. PURPOSE OF AND NEED FOR ACTION

My decision will result in the issuance of a Special Use Permit for the expansion, construction and operation of an alpine (downhill) ski area and adoption of the Master Plan to guide that development and operation. The Master Plan proposal and alternatives considered in detail involve development on both National Forest System lands and private lands.

The proposed access road will cross a parcel of National Forest System land and will require the issuance of a permit for a road right-of-way.

The need for the project is to meet the projected demand for alpine (downhill) skiing created by the population growth of the foothill, Sacramento Valley, and San Francisco Bay regions of California. Specifically, the developments will provide a quality downhill skiing experience to "day skiers," or those skiers identified in the Tahoe National Forest LRMP who would "commute on a daily basis from the foothill, Central Valley and San Francisco Bay areas." Day skiers currently are the major increase in Sugar Bowl's annual skier visits and are expected to continue to be the major component of this increased visitation.

A second purpose is to allow expansion of the existing Sugar Bowl resort as necessary to ensure continued operation of the resort. I believe this is necessary in order to retain an existing winter sports provider who is currently providing alpine skiing opportunities for National Forest visitors.

The need for the project was identified by the LRMP. The LRMP process identified probable demands for additional day-skier facilities and established policy direction which supports expansion of Sugar Bowl. Information developed in Sugar Bowl's master planning process indicated both an internal need for changes at the resort and a growing public need for intermediate and beginner level downhill skiing opportunities that would be offered by the expanded resort.

The Tahoe National Forest has a long history of land allocation to, and support for, downhill skiing at existing resorts in the Donner Summit area. Expansion of Sugar Bowl was specifically provided for in the 1978 Truckee-Little Truckee Rivers Management Plan, previous Multiple Use Plan, and most recently, in the 1990 LRMP, the primary tool used by the Forest Service to balance competing demands for National Forest resources and to allocate lands to specific uses. LRMP policy favors the expansion of existing ski resorts prior to the development of new resorts; however, the LRMP indicates that even with full development (expansion) of existing resorts there will be an unsatisfied demand for downhill ski facilities.

The LRMP analysis was reinforced by a study of market demand prepared by Sno-engineering Inc. in conjunction with preparation of the Draft EIS. The study indicated that, although the overall growth rate for downhill skiing has declined since the explosive period of the 1960's and 1970's, skiing in the Tahoe region has maintained a relatively steady growth rate through the 1980's. This growth continues in spite of statistics indicating a national leveling off of skier visitation growth. Skiing in the Tahoe region expanded at an average annual rate of about 2.7 percent from the 1984-85 season, to the 1988-89 season even during below average snowfall conditions. Sugar Bowl's 10-year growth rate has been comparable, averaging about 2.6 percent annually. Sno-engineering Inc. projects that growth in skiing in the Tahoe region will continue at rates varying from 1.8 to 3.0 percent. At these rates, potential increases in annual skier visits would vary between 626,000 and 1.1 million by the year 2000. In its analysis, Sno-engineering Inc. accounted for other potential ski area developments in the Tahoe region, including the proposed Galena Resort, and the Sierra Ski Ranch and Heavenly Valley improvements as well as other potential expansion within the Tahoe Basin. Assuming that all of this development takes place, demand will likely exceed planned supply in approximately 12-15 years at the present pace of skier visitation growth (increasing at 2-3 percent per year).

IV. PROPOSED FACILITIES

Proposed facilities associated with the Preferred Alternative are described in Section II(D) of the Draft EIS under the description of "Alternative 3, the Revised Master Plan." Project details associated with Alternative 3 as described in the Draft EIS have, for the most part, been carried forward intact to the Final EIS Preferred Alternative. However, the project design has been developed further in some cases. Following an assessment and consideration of the comments received in response to circulation of the Draft EIS, the modifications made to Alternative 3 are presented on Chapter II, beginning on page II-32 of the Final EIS.

A. Ski Mountain Improvements

New Mt. Judah facilities will include construction of three new chairlifts to access a total of 106 acres of new ski trails. The Mt. Judah and Jerome Hill lifts will provide the primary new lift capacity. Each of these lifts would be quads with an hourly capacity of 2,800 skiers. In addition to serving proposed new ski trails, the Jerome Hill lift will also provide the connection between the new Mt. Judah portal facilities and the existing Sugar Bowl lift and trail system.

Additionally, a new beginner lift will be located about 500-feet south of the day lodge. This double chairlift will serve about four acres of beginner terrain. The existing Disney double chairlift will be upgraded to a detachable quad lift, increasing lift capacity from 750 skiers/hour to 2,200 skiers/hour. The existing Meadow lift will be removed as the beginner terrain currently served by this lift will be provided at the proposed Mt. Judah facilities by the new beginner lift. Removal of the Meadow chairlift will eliminate certain skier congestion problems and the hazard of mixing skiers of different skiing abilities on the same ski runs.

Lift characteristics and capacity for the entire resort under the Preferred Alternative are illustrated in Table II-12 on page II-67.

TABLE 2-1
PROPOSED LIFT FACILITIES
PREFERRED ALTERNATIVE

Name of Lift	Type	Length (feet)	Vertical (feet)	Hour Capacity (pers/hour)	VTF	CCC
Existing Lift Retained:						
Christmas	Quad	2,000	510	2,200	1,122	540
Silver Belt	Quad	4,509	1,309	2,400	3,137	1,345
Nob Hill	Quad	1,270	205	2,200	1111	310
Crow's Nest	Double	3,170	927	1,030	954	570
Existing Lift Improved (from a double to):						
Disney	Det Quad	3,120	948	2,200	2,200	750
Existing Lift Removed:						
Meadow	Double	940	166	800	133	<265>
New Lifts:						
Mt. Judah	Det Quad	4,100	890	2,800	2,442	1,115
Jerome Hill	Det Quad	2,800	665	2,800	1,862	980
Beginner	Double	450	50	800	40	170
TOTAL						5,780

Note: VTF is "vertical transport feet"
CCC is comfortable carrying capacity in persons
Det Quad is detachable quad

Proposed ski-mountain improvements will improve Sugar Bowl's mix of skier terrain by ability level. Existing novice acreage would be more than doubled (increased from 24.7 to 58.7 acres), and low-intermediate acreage would be more than tripled (from 12.8 acres to 44.2 acres). Intermediate, advanced, and expert acreage would also be increased but to a smaller relative degree. With these improvements, Sugar Bowl's skier classification breakdown under the Preferred Alternative would more closely approximate the "ideal percentage of a full service ski resort"; these changes are illustrated quantitatively in the Final EIS, Table II-9 on page II-40.

Lighting to accommodate night skiing will be developed on certain ski trails served by the new Jerome Hill chairlift and the existing Christmas Tree chairlift. Night skiing has been incorporated into Alternative 3A as a traffic mitigation.

The ski trails served by the new chairlifts have been redesigned from those presented in the Draft EIS for Alternative 3 to avoid impacts to populations of *Silene invisia*, to protect historic features, to soften the impacts to the Pacific Crest Trail (PCT) setting, and to minimize soil, wetland, willow/alder stringers, and other vegetation disturbances.

B. Base Facilities

Skier services for Mt. Judah facilities would be provided at a new three-story day lodge to be constructed at the foot of the Mt. Judah and Jerome Hill lifts. The 30,000-square feet of planned space will provide support for ticketing, food and beverage services, restrooms, lockers, child care, equipment rental, and other support services. Proposed perspective and elevation drawings of this structure are shown in the Final EIS on pages II-53 and II-55 as Figures II-6 and II-7. The building site has been adjusted to avoid disturbance to adjacent wetlands.

C. Access and Parking

The Preferred Alternative includes the construction of a new vehicular-access portal for the resort. An all new 2,970-foot (0.6 miles) road with a 32-foot-wide paved surface will be constructed from Donner Pass Road to the proposed parking area and beyond to a turnaround and drop-off area adjacent to the proposed day lodge. The road will bridge the two Southern Pacific railroad tracks passing through the project area. The bridge over the northern track will be located at the tunnel portal; the access road will pass over Southern Pacific's Snowshed #33 which protects this tunnel portal.

The parking area will encompass about 8.1 acres and accommodates 1,050 vehicles. This is a reduction of 350 spaces from the 1,400 spaces that were presented in the Draft EIS for Alternative 3. Handicapped parking will be provided immediately adjacent to the day lodge with other skiers to be unloaded in the drop-off area. Of the parking spaces immediately adjacent to the Donner Pass Road at the existing Gondola Portal, 121 will be eliminated. The road and parking lot location were moved slightly from the original Alternative 3 design to avoid and minimize the disturbance of wetlands and to better facilitate handicapped visitor and bus parking.

D. Support Facilities

Support facilities to be constructed include a new one-story maintenance building and a snowmaking facility with a total enclosed floor area of about 14,000 square feet. A new 4,200-square-foot 40 employee dormitory will be constructed just north of the maintenance facility.

The Preferred Alternative includes installation of a snowmaking system serving Mt. Judah and Jerome Hill ski trails. A 10,000-gallon underground diesel fuel storage tank will be installed and existing fuel storage facilities totalling 62,000 gallons will be eliminated.

Surface runoff from the highly developed portion of the project area would be collected in a series of open drainage swales and delivered to a runoff detention and sediment retention pond. This pond will have a storage capacity of approximately 31,000 cubic feet, which would moderate increased runoff to project area waterways. A conceptual design of this detention pond was prepared to confirm a suitable location and function. This design has been used to determine the impacts of disturbance.

Construction and maintenance access to the ski slopes and upper chairlift facilities will be provided by constructing a four-wheel drive road. The road originally presented in the Draft EIS has been relocated in the Alternative 3A to avoid impacts to newly discovered evidence of the Roller Pass segment of the Truckee Route of the Overland Emigrant Trail.

E. Infrastructure

Water, sewer, power, and telephone lines will be extended to the Mt. Judah day lodge, maintenance building, and employee housing area from existing systems in the project area. Expansion at Sugar Bowl will contribute to overall electrical power demands in the Donner Summit area and the need for reinforcement of the electrical distribution system. PG&E indicates that these improvements would be required to meet anticipated needs regardless of the proposed expansion, with the exception of a new power transformer station.

F. Project Phasing

The Sugar Bowl expansion will be accomplished during two distinct phases. Phase I would likely be initiated in the summer of 1993. Phase II would follow in about two years.

Phase I expansion includes construction of:

Jerome Hill and Beginner lifts and associated ski trails
23,000-square-foot day lodge
14,000-square-foot maintenance building/snowmaking facility
4,200-square-foot employee dormitory
830 vehicle parking

Phase II expansion includes construction of:

Mt. Judah lift and associated ski trails
Expansion of the day lodge to 30,000 square feet
Expansion of the parking lot to 1,050 vehicles
Replacement of the existing Disney lift

The Disney lift replacement could be considered a third project phase. The cumulative effects of all phases are addressed in the Final EIS.

V. PUBLIC INVOLVEMENT

In conjunction with preparation of the Draft EIS, the Tahoe National Forest conducted a public involvement and agency scoping process pursuant to the Council on Environmental Quality (CEQ) guidelines that included the following:

Published a Notice of Intent in the Federal Register. The distribution of the Notice of Intent included "responsible" and "trustee" agencies which would, in the CEQA process, be given notice of EIR preparation (Notice of Preparation).

Conducted two public scoping meetings.

Conducted numerous informal meetings and field reviews of the project.

Mailed initial "scoping letter" that announced the proposal and subsequent announcements initiating the EIS process to involved or concerned public agencies, all known interested individuals and groups (e.g., those concerned with backcountry skiing, downhill skiing, historic features, trail uses, traffic, and the environment of the Donner Summit area). The latter group included all property owners on the Nevada and Placer County tax rolls with property adjacent to Donner Pass Road between Donner Summit and I-80.

Those who responded to the announcement and request for "scoping assistance" were retained on a mailing list. Others who did not respond but were considered key to understanding the ramifications of the decision on the project were also retained on the mailing list. Those that attended the two public scoping workshops were added to the list as were those who contacted either the Forest Service, Placer or Nevada Counties, or the Draft EIS consultant after the scoping meetings.

A newsletter was mailed in August, 1990 to the 123 individuals on the mailing list. The newsletter summarized the alternatives under consideration and the significant issues at stake and announced the anticipated release of a Draft EIS. Recipients were asked whether they desired a complete Draft EIS or a summary of that document. Because very few requested a summary, all responders to the newsletter were sent a complete version of the Draft EIS. Several dozen individuals and organizations who did not respond to the newsletter, but again were considered critical to the understanding of the project and associated impacts, were also sent the Draft EIS.

Upon release of the Draft EIS the Forest Service conducted two public workshops. The intention was to help individuals and agencies understand the project, the Draft EIS, and to clarify the procedures for submitting comment on the Draft EIS.

During the comment period, the Forest Service, Sugar Bowl Corporation, and the Draft EIS consultant met with a variety of interest groups to explain these same topics.

After the comment period closed, the Forest Service and the EIS consultant contacted several of those who commented on the Draft EIS to better understand their comments.

The Tahoe National Forest, Sugar Bowl Corporation, and the EIS consultant made numerous efforts to involve agencies, interest groups, and individuals in the analysis process, in addition to the formal contacts and processes.

The Final EIS was circulated for public and agency review from May 15 to June 15, 1992. A total of 117 copies of the Final EIS and an additional 206 copies of the summary were distributed for review. The Final EIS provided responses to the comments made on the Draft EIS. Eleven individuals or agencies provided written comments on the Final EIS. Exhibit "B" to this document provides a detailed response to these comments. One of the eleven comment letters was from State of California, Department of Fish and Game. One letter was from the United States Environmental Protection Agency's Region IX Office. Response to these two specific letters is discussed in this Record of Decision (ROD) as referenced below:

A. California Department of Fish and Game expressed concern with that portion of the preferred alternative that prescribed 3.3 acres of pruning in willow/alder vegetative cover. They expressed a belief that the planned mitigations (including the discontinuation of pruning on an equal acreage of willow/alder habitats at the ski resort) inadequately offset the effects of the planned action. They also pointed out the apparent conflict associated with this planned action and the adopted direction in the Tahoe National Forest Land and Resource Management Plan. They asked for further review of the need for the planned pruning and further review of the alternatives which will not require loss of wetland habitats.

The consequence of pruning willow/alder habitats was addressed in detail in the Final EIS beginning on page III-51 (affected environment) and continuing on page IV-65 (environmental consequences). No practical means to avoid these consequences have surfaced even though extensive interdisciplinary reviews have focused on ski trail modifications to avoid the need to prune riparian vegetation. This subject is discussed in more detail on page 16 of this document. The relationship of this activity and the LRMP is discussed on page 17 of this document.

B. United States Environmental Protection Agency stated that the Final EIS responded satisfactorily to most of their comments on the Draft EIS. They expressed a continued interest in their suggestion that the Forest Service consider National Environmental Policy Act documentation at the operations plan phase.

As presented on page 16 of this Record of Decision, under the topic of "Implementation Requirements", the Forest Service will review the various chapters of the Operations Plans (E.G. Ski Trail Development Chapter) to assure that the anticipated impacts are within the scale of consequences disclosed in the Final EIS. Future NEPA documentation, tiered to the Final EIS, may be appropriate.

Two of the eleven letters expressed concern with the proposed encroachment of the access road to Donner Pass Road near Donner Ski Ranch. These letters helped clarify Donner Ski Ranch's concerns as to how that intersection and associated traffic will influence business at Donner Ski Ranch. After several meetings with Donner Ski Ranch, potential solutions to these conflicts were developed. I recognize that Donner Ski Ranch, and some of the neighboring property owners, are not satisfied with these potential solutions and remain convinced that the Lake Mary Road should be used to provide access to the proposed Sugar Bowl parking area. It is my belief that this access road, as presented in the Preferred Alternative, presents fewer overall environmental impacts and good opportunities for the two ski resorts to work together to manage both arriving and departing traffic. The potential solutions have been presented to Placer and Nevada Counties for their consideration.

VI. ALTERNATIVES CONSIDERED

A. Development of Alternatives

Alternatives were formulated by first looking at the established purpose and need for action, identified alternative ways to meet those objectives (including off-site alternative locations for development of downhill ski capacity), and project design alternatives (including other locations in the Donner Summit area and those adjacent to the existing Sugar Bowl Resort). When evaluating both off-site and project area alternative sites, the Forest Service included and evaluated alternatives even though they did not meet the second priority purpose, "to retain an existing provider of downhill ski services." A screening process was developed related to the established purpose and need and the potential for effectively avoiding or minimizing adverse environmental impact. This process generated four alternatives to be considered in detail in the Draft EIS. To be eliminated, an alternative had to be deficient in meeting both purposes and/or clearly not offer opportunities to avoid or minimize adverse environmental effects. This process is documented in the Draft EIS. Public and agency comment generated by the circulation of the Draft EIS prompted further review of the alternatives withdrawn from detailed consideration. This review focused on alternatives that would:

generate additional ski capacity at Sugar Bowl without expansion onto additional terrain;

reduce the resort's fixed cost;

expand to the west of the existing resort;

modify the alternatives considered in detail to avoid contact with the PCT or providing better separation of project activities from the on-site historic properties; and

combine components of eliminated alternatives.

This further review, documented in the Final EIS, confirmed the disclosures made in the Draft EIS that the options presented above were not feasible in meeting the Purpose of and Need for the project while effectively avoiding or minimizing adverse environmental impacts.

The four alternatives considered in detail, including the "No Action" or no-project alternative (Alternative 1) as well as other variations on the proposed action respond to the environmental issues. The primary issues treated in the development of the alternatives considered were related to recreational issues and values associated with the Pacific Crest Trail, winter and summer backcountry use on Mt. Judah, wetlands disturbance, traffic, and historic values associated with the Emigrant Trail segments. Other issues related to resource disturbance (soils, vegetation, wildlife) were also considered in the development of alternatives.

The analysis team was unable to construct an alternative which would compensate for the loss of the Sugar Bowl Facility should it cease public ski operation. This is likely to happen without this expansion.

B. Alternatives Considered In Detail

Alternative 1 - The No Action Alternative would involve no expansion of the Sugar Bowl resort. The Resort would continue to operate more or less as it currently exists. Operating deficits would continue and may or may not continue to be subsidized by Sugar Bowl stockholders. Improvements to two existing lifts could be made under existing Placer County permits and Forest Service authorizations, resulting in a total resort Comfortable Carrying Capacity (CCC) of 3,360 skiers. This alternative is inconsistent with the identified project purpose as it would neither resolve Sugar Bowl's operational problems nor provide additional day skiing opportunities. It is carried forwarded in the EIS to provide a "baseline" for the analysis.

Alternative 2 - This is the proposed Master Plan submitted by Sugar Bowl. It includes the improvements listed under Alternative 1 plus construction of three new lifts on Mt. Judah, providing a total resort (CCC) of 5,780 and an increase of 2,420 skiers. New road access would be developed to a new Mt. Judah base area that would provide parking and day-lodge facilities. The proposed access road would be constructed in part along a new alignment. A portion of the Lake Mary Road would also be improved. This alternative increases resort capacity (CCC) by 2,420 skiers. Total annual visitation and opportunities for day skiers would also be increased substantially.

Alternative 3A - (Preferred Alternative) - This alternative essentially revised the Proposed Master Plan. Lift development is similar to Alternative 2, with an equal CCC of 5,780 skiers. Proposed facilities would be relocated to avoid environmental impacts associated with Alternative 2. New road access would be developed along an entirely new alignment rather than using the Lake Mary Road. The parking area would be located closer to Donner Pass Road by about 600 feet than in Alternative 2.

The Preferred Alternative further modifies Alternative 3 as presented in the Draft EIS. The primary modifications are site specific, aimed at minimizing or avoiding environmental impacts. These modifications are presented in Chapter II in the Final EIS and are related to the following subjects:

- Minor design modifications in the location of the access road, parking lot and day lodge area to further reduce the need to fill or otherwise impact wetlands. A wetland mitigation plan was developed to assure the replacement of the remaining impacted areas. This mitigation plan was included in the Final EIS.

- Modification of the ski runs to reduce the need to prune willow/alder cover and to reduce impacts to populations of *Silene invisia*.

- Relocation of the construction/service road to avoid impacts to the Roller Pass segment of the Emigrant Trail.

- Relocation of the Mt. Judah Loop Trail to avoid impacts to the Roller Pass and Coldstream segments of the Emigrant Trail.

- Establishment of an agreement between Sugar Bowl and Alpine Skills International to develop additional parking for backcountry skiers.

- Redesign of the storm-water detention pond to handle runoff from the more intensively developed areas.

- Elimination of certain parking spaces on Donner Pass Road adjacent to the existing Gondola portal to reduce vehicle/pedestrian conflicts and reduction of the number of parking spaces in the new parking area.

- Addition of night skiing into resort operations as an incentive to retain skiers on-site until peak traffic periods subside.

Alternative 4 - This alternative eliminates the Mt. Judah chairlift. The remaining two ski lifts described in Alternatives 2 and 3A would be constructed. This alternative does not involve significant expansion of ski terrain, but is oriented to providing enhanced access to existing Sugar Bowl facilities. Total resort capacity under this alternative would be 4,305 CCC. Parking, access, and day lodge facilities would be located as in Alternative 3A. The parking area and the day lodge would be reduced in size to reflect lower skier capacity. The overall resort capacity (CCC) increase would be about 945 skiers or about 40% of the increase under Alternatives 2 and 3A.

VII. RATIONALE FOR THE DECISION AND RESPONSE TO PUBLIC COMMENT

The selection of the Preferred Alternative was based in part on analysis of the effectiveness of alternatives considered in detail in responding to the purpose and need for the project while resolving environmental issues and concerns related to the project. I considered four major criteria in choosing the Preferred Alternative:

How well does the alternative provide for the increased demand for downhill skiing?

How well does the alternative resolve other recreational and environmental issues?

Is the alternative compatible with the plans of Placer and Nevada Counties?

Finally, how well does the alternative meet the needs of the Sugar Bowl operation, including their ability to meet the spirit and intent of the American's with Disability Act?

A number of people stated that there is sufficient capacity to meet future demand for downhill skiing. I recognize that estimates of downhill ski supply and demand relationships are highly subjective. Factors such as weather conditions and perceptions of ski or highway conditions can play very decisive roles in an individual skier's decision to ski on a certain day. These factors greatly influence participation at the resorts each winter. When the market that is served is a "day skier" population, such as is found at Sugar Bowl, the influence of these factors is even more pronounced. I recognize, too, that there is not a clear market segmentation between destination skiers and day skiers on the Tahoe National Forest. Rather, there are a great number of skiers who cross this line on a regular basis. For example, on any particular weekend, a skier from the Sacramento area, who normally drives up for only one day, may choose to go

for a two-day ski experience while spending the night in the Truckee or North Tahoe area. In that respect they have become a destination resort participant rather than a day skier.

On the question of supply, I have looked carefully at the projects that are under consideration and how these will meet a portion of the need for new capacities. Certainly, not all of the "planned supply" capacity will be realized within the next 12 to 15 years. Even those resorts most likely to be constructed in the near future are facing challenges that may prevent the full development of those facilities.

I have reviewed both sides of the arguments about the demand/supply relationship. I have concluded that as the population of the foothill, Sacramento Valley, and San Francisco Bay area grows in population, so too will the desire for day-skiing opportunities and, in turn, the need for additional day-skier capacities.

The Preferred Alternative responds to this demand while minimizing the effects on the other recreational uses in the area, such as backcountry skiing and hiking. The impacts to the PCT and Emigrant Trail recreation settings are substantially avoided or mitigated. The Preferred Alternative provides additional day skier capacities as well as a balance to the Sugar Bowl Ski Area by increasing capacity for beginning and intermediate level skiers.

The Preferred Alternative is compatible with and meets the requirements established by both Placer and Nevada Counties. The project design is within the spirit and intent of the American's with Disability Act because it will allow greater and easier access for the physically challenged.

The Preferred Alternative does incorporate all practical means of avoiding or minimizing environmental harm.

Alternative 2 proposes similar levels of development on different portions of the west slope of Mt. Judah that would result in unacceptable impacts to the environment, historic properties, existing recreation uses, and to the adjacent homesites. Alternative 4, while providing additional protection to the recreation setting of the PCT and Emigrant Trails, does not provide for reasonable development of the alpine skiing potential in the project area. Alternative 1, the No Action Alternative, does not provide for the additional ski opportunities that I believe are needed to meet future demand.

Response to Public Comments and Management Concerns

This Record of Decision reflects the many helpful comments received from agencies, organizations, and the public on the Draft EIS. Discussed below are more specific responses to the major public issues raised and further rationale for my decision:

1. Pacific Crest Trail

Issue: What are the potential impacts of the project on trail use and aesthetics? What is the potential for relocation of proposed ski facilities or the trail itself to reduce impacts?

The Preferred Alternative represents a modification of the original master plan proposal that will protect the integrity of the PCT proper and minimize effects on the trail use experience. Substantially more mitigation is offered than other alternative designs that involve direct impacts to the PCT proper or the PCT user's experience. Ski trails that cross the PCT have been narrowed to the practical minimum. Special construction and restoration practices, described in the Final EIS in Chapter 4, beginning on page IV-115, minimize the aesthetic disturbance on trail users by limiting vegetation removal and soil disturbances, promoting speedy revegetation (including the use of native species within near view of the trail), assuring that chairlift components are not obviously visible to the trail user, and assuring that the disturbances associated with the master plan are not repetitive. Key to the design of this alternative is the adoption of the mitigation to

construct the Mt. Judah Loop Trail which will provide a project-bypass opportunity, a detour opportunity during construction, and a new recreation opportunity for visitors seeking a scenic day hike experience.

Impacts to the PCT setting surfaced early in the scoping process as a public issue. National direction states that the development and use of the PCT must harmonize with existing uses of the land. Impacts to the PCT and it's uses persisted as an issue throughout the entire environmental analysis process and was the subject of much of the public response to the Draft EIS. Elimination of the Mt. Judah chairlift which crossed the PCT was considered in Alternative 4. Shortening this chairlift was also considered but offered little visual relief because the lift components could not be screened from the PCT, and also presented ski resort terrain mix problems. Adding length to the beginner chairlift was also considered but rejected because it would impact historic features and would not balance the ski resort mix of terrain. Eliminating one of the three ski trails that crossed the PCT was considered but would significantly bottleneck skiers in this area. Further reducing the degree of slope grading near the PCT would generate similar bottleneck problems.

I recognize that a substantial number of PCT users who wish to have a primitive or semi-primitive hiking experience may consider the impacts that persist after mitigation to be very disruptive. I do understand this perspective. However, Congressional intent for the PCT is to provide the user of the trail a variety of experiences from pristine to areas with intensive resource management.

Management direction for this particular portion of the PCT states:

> "The trail must coexist in harmony with all other resource uses and activities of the land. Practices will be modified as needed to protect the integrity of the trail as defined by adoption of the partial retention and modification visual quality objectives and 'rural recreation opportunity spectrum' goal."

Approval of this project, as mitigated, is consistent with our overall goals of management along the PCT and the adopted management direction for this specific portion of the PCT.

2. Emigrant Trail

Issue: What are the potential impacts of the project on the Emigrant Trail and associated historic interpretive values?

This is actually three distinct questions: a) impacts to the historic property; b) impacts to the recreation values; and c) future impacts to the headwaters region of Coldstream Canyon.

The Preferred Alternative avoids impacts on the historically important features of both the Coldstream and Roller Pass segments of the the Truckee Route of the Overland Emigrant Trail. The State Office of Historical Preservation has agreed with this determination. The Preferred Alternative also minimizes the effects on the recreation and interpretive values associated with these trail segments and provides for substantial mitigation for historic interpretive value effects. Under the Preferred Alternative, ski trails associated with the Mt. Judah lift have been relocated southerly to avoid direct conflicts with the Coldstream segment of the Truckee Route of the Overland Emigrant Trail as it is currently known to exist. A 100-foot-wide buffer strip of undisturbed native vegetation would provide screening that would prevent potential effects on the trail's values. The location of proposed facilities in the vicinity of the trail have been carefully planned and activities in the vicinity of the trail will be monitored by a qualified archaeologist. The project includes features that contribute to the historic interpretative values of the trail including the construction of interpretative exhibits at the Mt. Judah lodge and the provision of interpretative materials and identification of interpretative stations along the PCT and Mt. Judah Loop Trail routes.

Between the Draft and Final EIS, additional field reconnaissance was conducted to confirm the relationship between the proposed project and the location of the Roller Pass segment of the Truckee Route of the Overland Emigrant Trail. Prior to the Draft EIS, this historic trail segment was believed to be outside of any planned activity and well within the existing ski resort. New field investigation disclosed new evidence of the historic trail and found that certain features of all action alternatives were proposed in the vicinity of the historic trail. A construction and maintenance road, proposed under Alternative 3, was relocated to avoid crossing the newly discovered historic trail location. The proposed snowmaking pipeline location and the alignment of one ski trail was also changed to avoid impacts to the historic property. Slope grading planned under Alternatives 2, 3, and 4, on a second ski trail, has been dropped from consideration. This is in an area that is currently used by downhill skiers within the existing resort.

Also between Draft and Final EIS, additional field evaluation was performed on the proposed alignment and uses of the Mt. Judah Loop Trail. This recreation development is a PCT mitigation under Alternative 3A. This evaluation led to minor relocation of the proposed loop trail to avoid impacts to the Overland Emigrant Trail segments.

Additional protection measures have been adopted (and presented in Chapters II, III, and V of the Final EIS) to protect Snowshed #33, which will be bridged by the proposed access road. These protection measures constitute planned actions under the new Alternative 3A and assure that there will be no impacts to the character of this historic property that make it potentially eligible for the National Register of Historic Places.

I recognize that a substantial number of people who are concerned with the Overland Emigrant Trail and Snowshed features will find the identified consequences presented in Chapter IV of the Final EIS beginning on page IV-129, are understated. The California State Office of Historic Preservation has accepted the Forest Service's assessment of "no impact" to the Overland Emigrant Trail and the Transcontinental Railroad, Snowshed #33, from a National Register point of view. Protection measures have been prescribed to assure no impact. Interpretive opportunities have also been adopted to enhance visitor enjoyment of the Emigrant Trail segments. These opportunities are prescribed in Chapter IV beginning on page IV-109.

The public raised concern about the possibility of future ski area development in "Emigrant Meadow" and the headwaters region of Coldstream Canyon. The Emigrant Meadow area is within the existing permit area for Sugar Bowl. Two downhill ski trails are in the Emigrant Meadow area and additional downhill skiing occurs through the trees. Although there are no current plans for additional development of this area, the option for future development remains open. No cultural resource surveys and/or evaluations for this area have been completed, but there is reason to suspect that the Roller Pass segment of the Emigrant Trail in these areas would be eligible for listing in the Register of Historic Places. The extent and significance of the cultural resources are unknown at this time and were not addressed in this EIS as no development is proposed for Emigrant Meadow. Any future proposals would require an extensive cultural resource analysis before approval.

Management of the headwaters of Coldstream has been controversial since the early 1970's when a ski resort proposal was first being considered. A significant change in land ownership in Coldstream Canyon occurred when the California State Department of Parks and Recreation began acquiring additional lands in the lower end of the watershed. The State indicates they plan to manage the lands primarily for dispersed recreation. Because any significant ski development in Coldstream would require the need to use federal, state, and private lands, the potential for ski development is limited.

3. Off-Track or Backcountry Skiing

Issue: What is the potential for exclusion of, or impacts on, existing recreational uses of the Mt. Judah area, in particular backcountry skiing? What are its potential impacts on access and parking availability for these activities? What is its potential for cumulative impacts on backcountry skiing?

The Preferred Alternative reduces the impacts on backcountry skiing opportunities by not excluding any existing recreational use. Tahoe National Forest policy assures access through the permit area for all users, including backcountry skiers. Other enhancements provided to the backcountry skier include the provision of a one-way lift ticket. Sugar Bowl will make parking and a register available for backcountry day skiers using the one-way ticket system. Sugar Bowl will also participate with Alpine Skills International at Donner Summit by providing an additional ten (10) parking spaces for general backcountry skier use. These parking spaces can be used for individuals who are planning an overnight trip or for exploring terrain in the Donner Summit area on a day visit trip.

I recognize that backcountry skiers view the area and the vicinity of Mt. Judah to be one of the few remaining portions of the Donner Summit area where they can readily escape direct contact with an urbanized setting. Recreation development and changes in landownership goals in the Donner Summit area, particularly the development of track skiing opportunities, have excluded many backcountry skiing opportunities or has reduced the quality of that experience. There will be some impacts associated with implementation of the Preferred Alternative. The impacts are partially mitigated by actions adopted for the Alternative 3A, which provide opportunities to use a chairlift to aid travel into the backcountry and an additional ten (10) new parking spaces to be developed at Alpine Skills International, which is primarily used by backcountry skiers. The additional parking spaces will off set one of the primary problems in the area. I realize that this does little to mitigate the issue for those who are seeking a more primitive experience. I also recognize that some of this terrain has been used by backcountry skiers and downhill skiers for over 40 years in the vicinity of Roller Pass and along the crest from this saddle to Mt. Lincoln.

4. Water Quality

Issue: What are the potential impacts of facility construction on soil erosion and sedimentation, and impacts of runoff from parking and roadway areas?

The Preferred Alternative applies extensive Best Management Practices (BMP's) that are intended to reduce erosion and sedimentation impacts. The Forest Service requires that these BMP's be employed for all winter sports developments on the Tahoe National Forest, including ski trail developments at Sugar Bowl, and have found them to be effective in minimizing erosion and sedimentation. In addition to adoption of these BMP's, runoff from the highly impacted areas (parking lots, lodge, and maintenance areas) would be directed to a runoff-detention and sediment-retention pond, which would substantially reduce sediment discharge and peak flows from the project area. The parking facility drainage system would include traps designed to reduce the oil, grease, and other contaminant content of runoff. The combined effect of implementing the BMP's and constructing these facilities will assure that the unavoidable adverse effects will be below the Threshold of Concern for the watershed.

5. Roads and Traffic

Issue: How will potential impacts on Donner Pass Road and Interstate 80 congestion be minimized?

The Preferred Alternative includes implementing physical and non-physical mitigation measures to reduce peak hour traffic flows. Principal non-physical mitigation measures include institution of a Sunday or holiday morning half-day lift ticket program, and a night skiing program. Both measures are designed to reduce the number of skiers leaving the area during peak traffic periods, usually Sunday or holiday afternoons. The winter opening of Donner Pass Road over the summit to Donner Lake was accomplished in 1990-91, which has reduced existing resort impacts on local roads and highways, especially on Donner Pass Road between the Gondola area and Interstate 80.

Placer County Department of Public Works has concluded that "the project will result in adverse traffic impacts which may not be entirely mitigatable, especially on peak days and under cumulative conditions."

Based on this conclusion, the Department has determined "that a Statement of Overriding Consideration be required for this project", as provided by the California Environmental Policy Act.

The acceptability of the traffic mitigations and unavoidable adverse impacts, including encroachment onto Donner Pass Road, are within the jurisdictional authority of Placer and Nevada Counties.

6. Air Quality

Issue: What are the potential local and regional impacts of the project on air quality? Will ambient air quality standards be exceeded? How will the project affect air quality in Class I areas?

None of the alternatives would have a significant effect on local or regional air quality. Even at congested intersections, and in the parking areas when traffic is detained for metering purposes, the project would not exceed ambient air quality standards. The project is not expected to impact any Class I areas. The local Air Resources Board indicated that the project will not be in conflict with their standards.

7. Visual Resources

Issue: What are the potential impacts of the project on views from local roads and highways?

The Preferred Alternative meets the LRMP Visual Quality Objectives (VQO) for the project area which includes Modification for the base facilities and Partial Retention for up slope developments (ski trails and chairlifts) as viewed from local roads, highways, and other viewing areas. The views of the ski lifts and ski trails as seen from the PCT would also meet Partial Retention VQO after revegetation has healed the evidence of ski slope clearing. Foreground view impacts along the proposed access road and at the base area would be minimized by design details oriented to providing compliance with adopted modification VQO's for this area.

The addition of night skiing as a mitigation for the traffic program will potentially affect night views in the vicinity and west of the Sugar Bowl Gondola to the Baker Ranch Road. Night skiing is a common activity in other ski areas in the Donner Pass/Soda Springs area and is currently considered an acceptable activity by many of the residents in the area.

The access road and bridge over Snowshed 33 will introduce a new feature into the landscape as seen from the Donner Ski Ranch day lodge. The existing foreground of this viewshed is already highly influenced by transportation and utility features. The new road and bridge will have only a small effect on the visual quality as seen from Donner Ski Ranch and nearby private properties.

8. Threatened and Endangered Plants and Wildlife

Issue: What are the potential impacts of the project on sensitive plants and wildlife as a result of project construction and operation?

The Preferred Alternative does involve some direct and indirect effects on *Silene invisia*. The Preferred Alternative attempts to minimize the effects through a redesign of potentially impacting ski runs and by adoption of mitigation measures aimed at retaining the microclimate and species composition in the vicinity of these potentially impacted colonies. This Alternative minimizes the amount of habitat loss and reductions in habitat continuity. The effects are not considered a threat to viability of the species.

There are no significant effects on threatened, endangered or sensitive wildlife or habitat even though there will be minor additional fragmentation of potential habitat. One ski trail has been redesigned to minimize potential marten movement impacts.

The Tahoe National Forest did obtain an updated species list from the US Fish and Wildlife Service on June 5, 1992. Wildlife Biologist on the Tahoe have reviewed the information that is available on these species and concluded (via a supplement to the Biological Evaluation prepared for this project), that there would be no impacts to these recently listed Category on and two species or their habitat.

9. Wetlands

Issue: What is the extent of potential disturbance and filling of wetlands along the access road and in the proposed parking area; how much disturbance and trimming of wetlands would occur within proposed ski trail areas?

The Preferred Alternative minimizes filling wetlands to about 0.65 acres. A wetlands mitigation plan in the Final EIS will replace filled or otherwise impacted areas on a 2.5:1 ratio. The mitigation plan assures that "no net loss" of wetland acreage or value associated with facility construction will occur.

After field verification, the Army Corps of Engineers has issued a N-26 Nationwide Permit to fill 0.95 acres of wetland (the 0.65 acres addressed above plus 0.30 acres of wetland that could conceivably be indirectly impacted) under their regulations for implementing the Clean Water Act 404 Permitting Procedures.

The ski trails have been redesigned to minimize the need to trim or prune riparian areas to accommodate early season skiing. Trimming or pruning has been reduced to 3.3 acres. The wetlands mitigation plan also curtails 3.9 acres of similar existing trimming or pruning on property owned by Sugar Bowl near the Crow's Nest chairlift. This is approximately a 1:1 replacement in kind ratio. Practices will minimize the trimming of wetland vegetation located within ski runs. There will be some loss of wetland habitat value represented by the loss of older and larger plants due to the pruning. The replacement acres will consist of younger and smaller sized willows and alders. These lost values are associated with the location of the riparian areas and the size of the plants growing in these areas. Since the new pruning will be maintained through time, the impacts will persist as long as the riparian areas are re-cut. I believe the impacts have been satisfactorily mitigated and the effects are within acceptable limits.

10. Vegetation:

Issue: What is the extent of potential disturbance to old-growth timber and to the values of these old-growth timber stands?

The Preferred Alternative will modify vegetation on about 21.5 acres of old-growth red fir. The residual pockets of timber that remain on the west slope of Mt. Judah are, for the most part, separated by developed areas or heavily harvested areas that no longer retain old-growth values. The Final EIS identifies the magnitude of impacts to the values that are attributed to "old growth." Of primary concern is the effect of additional fragmentation of wildlife habitat values. These anticipated impacts are not considered critical to any special status wildlife species.

VIII. IMPLEMENTATION REQUIREMENTS

Management constraints and mitigation measures are required by this decision. A summary of these measures is found in Chapter IV of the Final EIS under the specific element of the environment for which they were developed. A complete listing of the mitigations is presented in Chapter V of the Final EIS along with a monitoring plan. These measures are quite stringent, will be costly to implement, and in some cases set important precedent for future developments, but I believe that they are absolutely necessary to minimize or eliminate negative consequences. I am firmly committed to their implementation.

The Final EIS also discusses mitigation that can occur in relation to private land development. Many of these measures were suggested by local agencies in response to the proposal. While I do not have the authority to enforce these measures, I do have the responsibility to identify those measures that will minimize the potential adverse consequences identified in the Final EIS. The presentation of mitigations made in Chapters IV and V do include those that fall within the authority of local agencies.

The analysis of this project was made on a very site specific basis. Specific preliminary designs were prepared to facilitate the analysis of certain key environmental concerns. For example, the access road and parking area were surveyed and designed to define the exact amount of wetland that would be impacted, and to determine the location and design of the storm-water-detention system. As such, the project can proceed directly to the development of individual project details.

The Special Use Permit requires the submittal of an Operating Plan for each phase of design, construction, operation, maintenance, and replacement where appropriate. I anticipate that the operations plan will be presented by the proponent in chapters specific to the actions to be taken. For example, one chapter will be a "logging plan," a second will be a "ski trail grading plan." The Forest Service will review these chapters to assure that the anticipated impacts are within the scale of consequences disclosed in the Final EIS and that the relevant mitigation measures will be incorporated in this phase of implementation. Future National Environmental Protection Act (NEPA) documentation, tiered to the Final EIS, may be appropriate.

IX. ENVIRONMENTALLY PREFERABLE ALTERNATIVE

I judge Alternative 1 or the No Action Alternatives to be the environmentally preferable alternative. It protects water quality, long-term soil productivity, riparian areas, air quality, visual quality, and wetlands along with providing protection of the PCT and Emigrant Trail recreation setting. In so judging this alternative, I recognize that the unmet needs can have a severe effect on the relationships between supply and demand for downhill ski services. This may include a loss of a total ski resort Comfortable Carrying Capacity of 3,360 should Sugar Bowl cease to exist as a provider of public downhill skiing. In so judging this alternative, I have not accounted for environmental impacts associated with other ski resort developments, including new resorts, that would be brought forth to meet this displaced or unsatisfied need.

X. AUTHORITY

The authority to make a decision on this proposal is found in the National Forest Ski Area Permit Act of 1986 (16 USC 497b), the Multiple-Use Sustained-Yield Act of June 12, 1960 (16 USC 528-531), and the National Forest Management Act of 1976 (42 USC 4321, 4331-4335, 4341-4347). The Ski Area Permit Act authorizes the Forest Service to issue long-term permits for the purpose of alpine skiing development. The Multiple-Use Sustained-Yield Act states the policy that National Forests are established and shall be administered for recreation (and other) purposes. The National Forest Management Act provided for development of long-range plans for forest management; the Tahoe National Forest Land and Resource Management Plan was completed and approved in June of 1990. The National Environmental Policy Act requires a detailed statement on the ski area proposal. This has been provided by the Final EIS. This Record of Decision, founded on the Final EIS and a review of the comments received on the Final EIS, documents my decision on the matter.

XI. FINDINGS

A. Forest Plan Consistency

I have reviewed this decision and find that allowing ski area development on National Forest System land is consistent with the Forest Land and Resource Management Plan. The LRMP specifically allocates the

applied for area to downhill skiing subject to site specific analysis for any proposed project. The Final Environmental Impact Statement for the proposed Sugar Bowl Master Plan has accomplished this further analysis.

The Preferred Alternative, with adopted mitigation measures, has been designed to comply with the Tahoe National Forest's Forestwide Standards and Guidelines (S & G's).

The LRMP recognized that occasionally, a practice proposed for a management area may be partially incompatible with one or more of the S & G's and additionally recognized that on-site conditions may dictate the need for a variance from the S & G's or Management Area Direction. Variances must be justified in the appropriate project analysis document (Forestwide Standards and Guidelines page V-14).

Specific conditions do exist at Sugar Bowl that will require a variance from the full adoption of the S & G's. The specific S & G's involved and the specific condition are summarized below:

S & G #46 RIPARIAN AREA/PERENNIAL SMZ MANAGEMENT

S & G #47 INTERMITTENT/EPHEMERAL SMZ MANAGEMENT:

In association with Appendix F of the LRMP, these S & G's define and prescribe measures to protect the resource values associated with riparian areas, including resolution of conflicts between protection of riparian-dependent values and management of non-riparian dependent values. Recreation values are defined as "non-riparian dependent."

The Preferred Alternative will meet these standards except for developing ski trails that follow the natural flow of the land, and normal burial of the riparian cover by snow. The structure and function of the riparian areas will not be materially affected. The only impact will be where ski trails cross willow/alder stringers that are used by wildlife.

In consultation with California Department of Fish and Game, the riparian wildlife habitat values were most limiting and, therefore, most important in determining the amount of activity allowed in these riparian areas. Under the Preferred Alternative, 3.3 acres of willow/alder cover type would be pruned or trimmed to allow for early season skiing. A study of the potential impacts to wildlife and their habitat was commissioned and summarized in the Final EIS. Relocating the ski trails to adjacent cover types was explored and withdrawn from full consideration because environmental impacts would be increased, not reduced.

Because the ski trails cannot be designed to completely avoid 3.3 acres of willow/alder pruning, a variance from S & G #46 and #47 is granted.

The ski trails have been redesigned to reduce the need for pruning from 15 acres to 3.3 acres. The pruned areas have been shifted to the edge of the ski runs and riparian areas or have been designed to cross the riparian stingers rather than follow down the stringer. The degree and trimming of both initial and maintenance pruning will minimize the duration of the impacts. As a final mitigation, the acres of pruned vegetation will be replaced in kind by curtailment of 3.9 acres of existing pruning at Sugar Bowl.

This variance only relates to an isolated 3.3 acres within the project area and does not require an amendment to the Forest Plan nor a change in either S & G or Appendix F.

S & G #55 MAINTAIN SOIL PRODUCTIVITY

In association with Appendix H of the LRMP, this S & G has been designed to maintain long-term soil productivity on site. Long-term soil productivity can be affected by changes in three soil characteristics:

soil porosity, soil cover, and soil organic matter. The guidelines are to be met on 85 percent of an activity area. The S & G sets standards for these soil characteristics.

The soil productivity standard was developed to maintain long-term soil productivity on lands to be used for long-term timber management activities. The standard is not intended to be applied where lands are used for activities like developed camping, mining, downhill skiing, and/or for road construction.

The Preferred Alternative will provide for long-term soil productivity by adopting best management practices to prevent erosion such as the use of mulches and fertilizers to supplement the loss of nutrients. Large woody material will be placed near the ski trails and will serve productivity and nutrient-cycling goals. The placement of large woody material on the ski trails to provide for soil productivity would create an unacceptable safety hazard to skiers.

B. Amendment to the LRMP

My decision is to initiate the Forest Plan Amendment process to change the LRMP management direction described in the Tinkers Management Area, MA 71, for the headwaters of Coldstream Canyon. The proposed Plan Amendment will provide clarification and slight modification of existing Plan direction. The following statement is proposed for addition to the LRMP on page V-380, Section III entitled Resource Management Emphasis:

> "Manage the East Slope from Donner Peak to Mt. Anderson for dispersed recreation values. Do not consider this portion of the MA available for downhill ski development."

The overall Multiple Use Goals and Objectives identified in the Forest Plan would not change. Forest Service policy, as stated in 36 CFR 219.10(f) and FSM 1922.5, allows Forest Plan Amendments to be adopted resulting from analysis conducted during plan implementation. A separate analysis will be completed to initiate the proposed Forest Plan Amendment.

XII. FINDINGS REQUIRED BY OTHER LAWS

The Preferred Alternative is consistent with provisions of the National Forest Management Act, Endangered Species Act, the Clean Water Act, the Clean Air Act, and the National Historic Preservation Act.

A complete cultural resource inventory has been accomplished for the project area. Cultural resources identified have been evaluated for their eligibility for the National Register of Historic Places. Significant cultural resources which meet the eligibility criteria will not be affected by the proposed activities, because sufficient protection measures have been provided through project design. A professional cultural resource specialist will monitor the condition of cultural resources during the project and following project completion. The State Historic Preservation Officer has been afforded an opportunity to review the project in accordance with 36 CFR 800 and has agreed with the Forest Service's determination of "no impact" to the historic properties in or near the project area.

XIII. IMPLEMENTATION DATE

This project will not be implemented for at least 45 days after legal notice of this decision is published in the Grass Valley Union.

IVX. RIGHT TO ADMINISTRATIVE REVIEW

This decision is subject to appeal in accordance with the provisions of 36 CFR 217. Any written notice of appeal of this decision must be fully consistent with 36 CFR 217.9, "Content of a Notice of Appeal," including the reasons for appeal, and must be filed with:

RONALD E. STEWART
Regional Forester
Pacific Southwest Region
USDA Forest Service
630 Sansome Street
San Francisco, California 94111

Notice of appeal must be filed within 45 days of the date of the published legal notice (Union, Grass Valley, California) of this decision or before September 10, 1992.

Appellants must submit two copies of a Notice of Appeal. As a minimum your notice of appeal *must*: include your name, address, and telephone number; identify the decision being appealed (include the title of this document, its date, and the name and title of the Forest Officer who signed it); specify that portion of the decision that you object to; state the reasons for objecting, including issues of fact, law regulation, or policy; identify the specific change(s) in the decision that you seek. Your appeal can be dismissed if the Notice of Appeal fails to meet the minimum requirements of 36 CFR 217.9 to such an extent that the Reviewing Officer lacks adequate information on which to base a decision.

Contact Person

For additional information contact:

Joanne Roubique, District Ranger
Truckee Ranger District
Tahoe National Forest
10342 Hwy 89 N.
Truckee, California 96161
(916) 587-3558

The Environmental Statement and Technical Appendices are available for public review at the Truckee District Office and the Forest Supervisors Office at Highway 49 and Coyote Road in Nevada City, California (916-265-4531). These same documents are available in the Placer County Library, Auburn; the Nevada County Library, Nevada City and Truckee; Robert Crown Law Library, Stanford; and the Donner Summit PUD office, Soda Springs.

I encourage anyone who is considering an appeal to consult with me prior to submitting their appeal notice to see if their concerns can be resolved.

John H. Skinner
JOHN H. SKINNER
Forest Supervisor

July 27, 1992
Date

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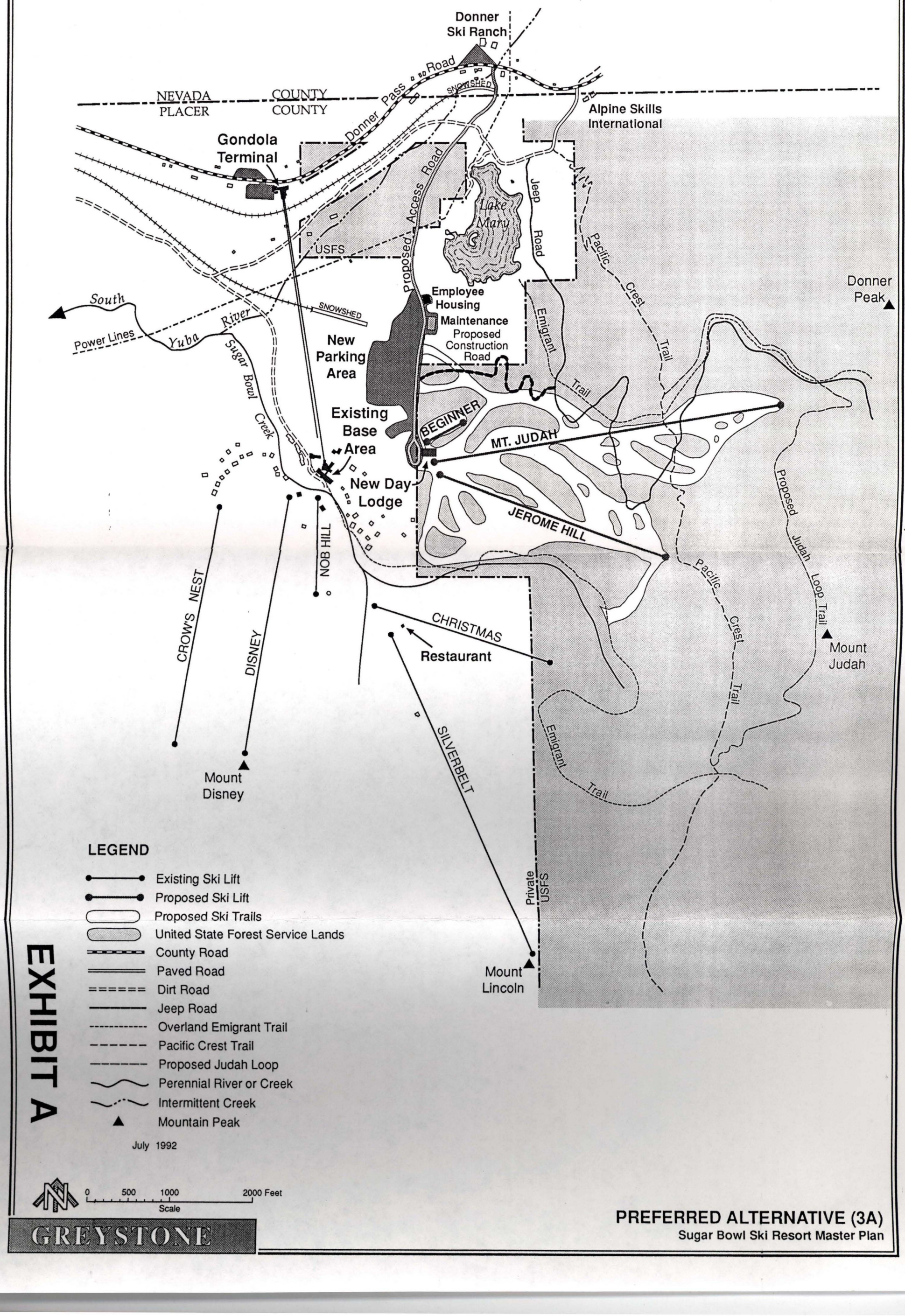

EXHIBIT B

Sugar Bowl Ski Resort Master Plan
RESPONSE TO COMMENTS ON FINAL EIS

LIST OF COMMENTORS

Deanna M. Wieman, Director, U.S. EPA, Region IX	1
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James Messersmith, Regional Manager, CA Department of Fish and Game, Region 2	21
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Sugar Bowl Ski Resort Master Plan
RESPONSE TO COMMENTS ON FINAL EIS

Commentor #1
Deanna M. Wieman, Director
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Comment #1-1
The comment acknowledges the adequacy of the TNF's response (in the Final EIS) to EPA's comments on the Draft EIS and identifies no technical inadequacy in the Final EIS. EPA reiterates its suggestion that the Forest Service consider NEPA documentation at the operations plan phase so that project design documentation and plans for mitigation, erosion control, and monitoring would be available for public review.

RESPONSE:
This subject was addressed in the Final EIS, Chapter VI, on page VI-26. The Forest Service anticipates that the Operations Plan will be presented by the proponent in chapters specific to the actions to be taken. As it acknowledged in the Final EIS, the Forest Service believes that additional NEPA documentation, tiered to the Final EIS, may be appropriate, and the Forest Service will prepare such documents, if warranted.

Commentor #2
Steven Grimm, General Manager
Donner Ski Ranch (DSR)

The comment letter raises several issues of visual, traffic, and economic impact which were raised in Donner Ski Ranch's (DSR's) comments on the Draft EIS. Chapter VI, Response to Comments of the Final EIS included a section devoted to addressing comments related to traffic in the vicinity of DSR, and more specifically to the impacts of the Alternative 3 access road. This discussion is located on page VI-92 of the Final EIS.

A major theme in the DSR comment letter is that DSR was afforded only limited opportunities to participate in the environmental impact analysis and decision-making process for the Sugar Bowl Master Plan. In fact, the analysis and consideration of the Sugar Bowl project has included significant opportunities for agency, public, and business participation. During the period 1988-1992, DSR was provided several direct and indirect opportunities to participate in the process. These included formal notice published in the Federal Register and local newspapers, pre-EIS scoping meetings, and a workshop on the Draft EIS attended by DSR officials. In addition, a scoping letter, a copy of the Draft EIS, and the Final EIS were provided directly to DSR for their review. Comments were also provided by DSR directly to Sugar Bowl representatives. These comments were discussed extensively with Forest Service staff and the EIS contractor as well as with Placer County and Nevada County staff.

In addition to the consultation with DSR about this project prior to the Final EIS, the Forest Service, Sugar Bowl, Nevada County, and Placer County officials have met with DSR on several occasions since the release of the Final EIS. The intent of each of these meetings was to clarify the concerns expressed by DSR and to review potential mitigation measures. While a good-faith effort has been made to resolve DSR concerns, the responses provided below may not be acceptable or be considered adequate by DSR (and neighboring property owners).

Through the course of reviewing the DSR letter and through the various clarification meetings with DSR officials, the Forest Service and Nevada and Placer County officials have learned that DSR is as concerned with arriving traffic as they are with departing traffic. This was not clear in the text of the letter DSR and their affiliates presented in response to the circulation of the Draft EIS. Hence, the Final EIS response to comments focused on departing traffic although the guidelines presented in the Final EIS for the TMP did recognize some arriving traffic considerations.

Resolution of traffic or other environmental issues associated with the project, could result in construction or modification of existing roadway or parking facilities (for example, turn lanes at Baker Ranch Road/Donner Pass Road, shoulder improvements along Donner Pass Road, and development of off-street parking at DSR). Those proposals may involve some environmental effects including minor earth moving and changes in parking, access, and snow removal and storage. The potential for such effects may trigger the need for environmental review and documentation by the agency with jurisdiction under CEQA, in this case Nevada or Placer County. Since the environmental setting for these off-site mitigations are largely existing County road right-of-way and disturbed areas, the likelihood of significant environmental consequences are quite small even in the cumulative sense.

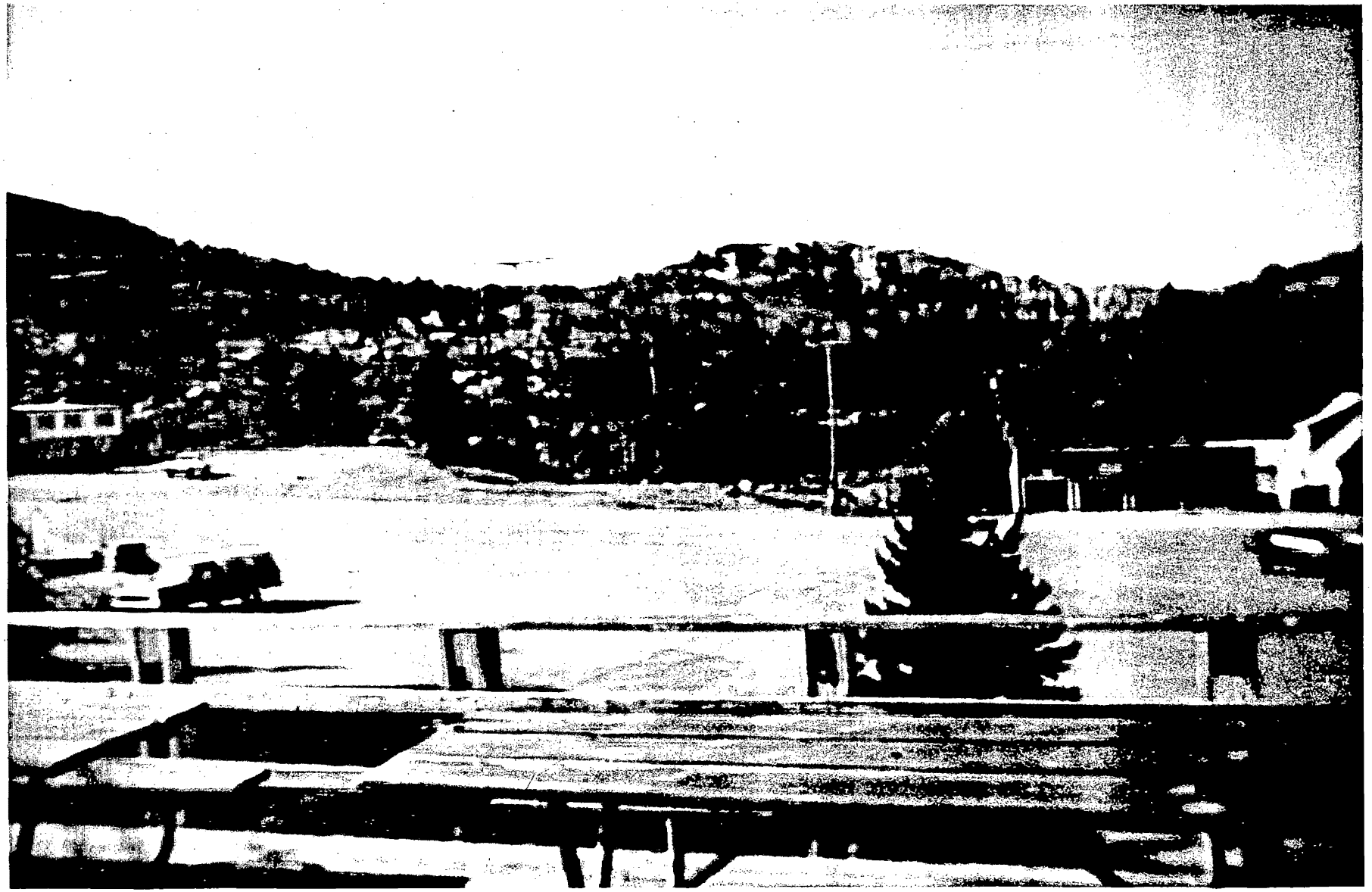
During post-Final EIS issue clarification meetings with DSR, Mr. Grimm stated that his and DSR's concerns are all addressed in the subject comment letter. Even so, the Forest Service identified other issues during these meetings which it believed should be addressed in this response document. These issues are listed under commentor #12.

Comment #2-1

New access road will have negative visual environmental impact on persons working and living in the vicinity.

RESPONSE:

Visual resource impacts of the project are discussed in Chapters III and IV of the Final EIS, beginning at pages III-107 and IV-134. The visual impact of the new access road at Donner Pass Road was not specifically addressed but is not expected to be significant. A visual simulation has been prepared which illustrates the visibility and aesthetic impact of both the road and the bridge over the snowshed from the deck at the DSR lodge. The existing foreground viewshed (which would be influenced by the road and bridge) is highly influenced by man-made features, predominantly existing transportation and utility features which include Donner Pass Road, electrical transmission lines, development along the roadway and Donner Ski Ranch's parking and base area. The simulation, Figure 1, confirms the generally disturbed nature of views in the vicinity of the proposed access and illustrates the minimal degree to which the existing viewshed will be changed. By replacing an existing grading area, the proposed access would provide some improvement in existing conditions. The proposed access includes landscaping adjacent to the roadway to soften effects on



Source: Greystone

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Figure 1A
ALTERNATIVE 3A ACCESS ROAD
VISUAL SIMULATION, BEFORE

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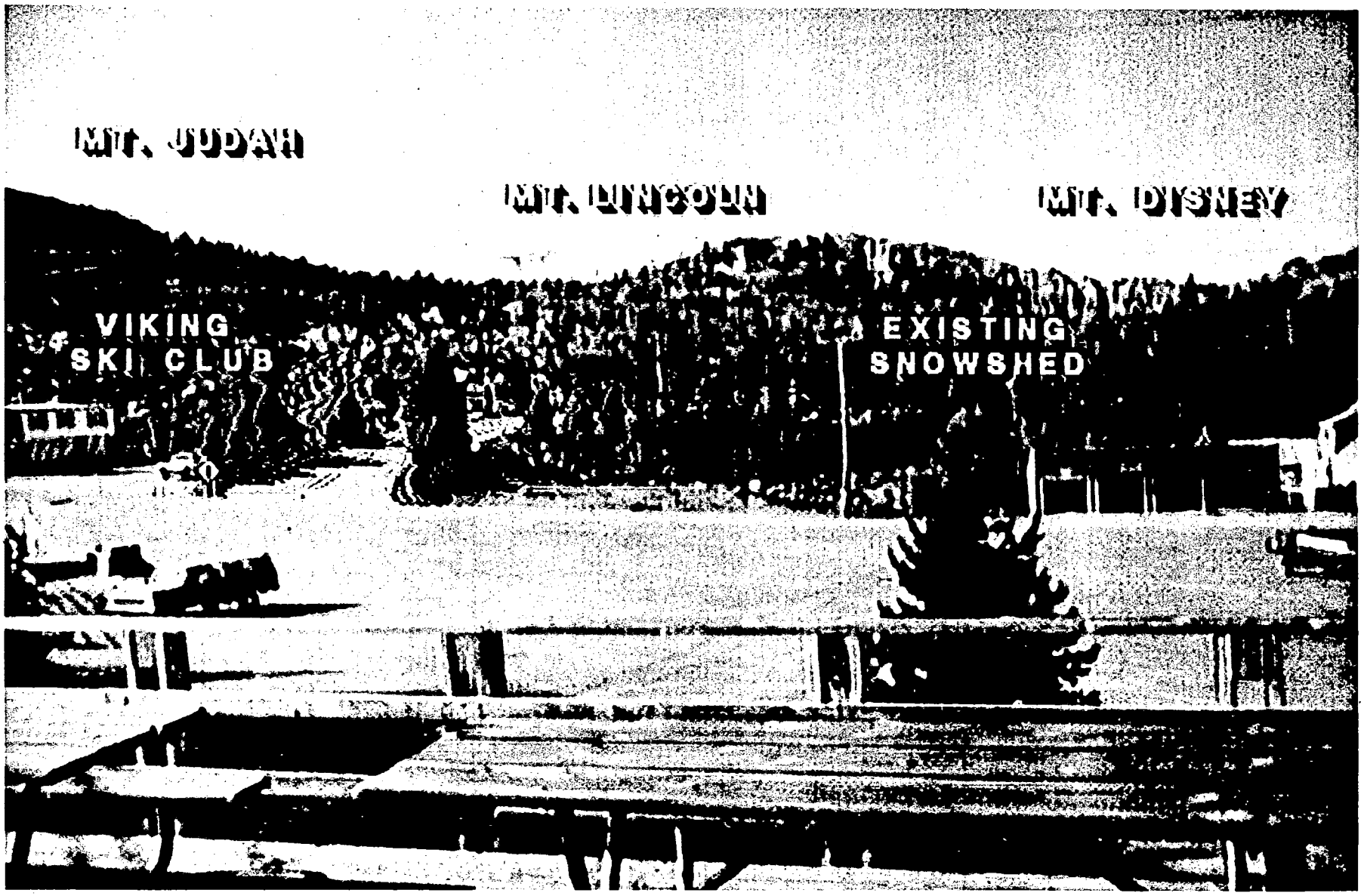

Source: Greystone

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Figure 1B
ALTERNATIVE 3A ACCESS ROAD
VISUAL SIMULATION, AFTER

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adjacent properties . Mitigation measures set forth in the Final EIS would assure "no-effect" on the snowshed feature (page IV-133).

Comment #2-2

Forest Service should help with improvements to the environment instead of condoning further degradation. Why build a new road, when an existing road will do just fine? Consider the viewpoints of all affected parties.

RESPONSE:

This comment reflects on the Forest Service's decision to accept Alternative 3A over Alternative 2. Additional information on this decision is provided in the Responses to Comment #'s 2-16 and 12-3.

The Forest Service is obligated to consider, and has considered, a wide variety of public uses and concerns including those of DSR as well as the Lake Mary residences and others living and working in the Donner Summit vicinity. This effort is evidenced by the extensive public involvement process discussed in the introduction to the responses to this commentor and extensively documented in the Final EIS.

Comment #2-3

No assurances that the old wooden snow-shed #33 will be retained in its entirety and without damage to the structure. "Many of us who have lived in this area for a long period of time recognize the historical nature of the ..... snow-shed and do not want to see it damaged or removed in favor of a new access road, nor would we like to have our view of it obstructed in any way."

RESPONSE:

The historical significance of the snowshed, and the issue of impact on historical values associated with the snowshed was addressed in the Final EIS on pages IV-129 through IV-133. Construction of the proposed bridge would not physically affect the snowshed. Cultural resource protection measures have been adopted (see page IV-133 of the Final EIS) to assure that the bridge structure does not impact the snowshed feature. Protection measures require that

> *"the final design of the bridge over the snowshed must recognize that the bridge will not be on (in contact with) or in front (west) of the SPRR Snowshed No. 33. The easement to be obtained by Sugar Bowl from Southern Pacific RR will clearly indicate that the bridge will not obscure, touch, or otherwise alter the snowshed structure."*

Figure 2 illustrates a cross-section of the proposed bridge. The bridge is expected to be constructed of concrete, colored to match, as nearly as possible, rock outcrops in the surrounding landscape. Figure 1 enhances the coloration of the bridge to better illustrate its position in the subject views. However, there will be no highly reflective surfaces on the proposed bridge.

As noted in the above discussion regarding the access road's impacts on views from DSR, existing views of the snowshed will not be obscured by the proposed bridge. These views are illustrated on Figure 1.

Comment #2-4
The decision on Alternative 3A appears to have been reached in a vacuum when it comes to DSR. We informed Sugar Bowl. . . that we would take a negative position on that alternative, as well as the entire project if necessary.

RESPONSE:
Chapter VI, Response to Comments of the Final EIS included additional information on Donner Pass Road beginning on page VI-86. Comments to the Draft EIS received from DSR were addressed in the Final EIS beginning at page VI-92. Opportunities provided to DSR to participate in the EIS process are discussed in the introduction to responses to this commentor (page 1). Consideration of alternative access routes is discussed in the Response to Comment #'s 2-16 and 12-3.

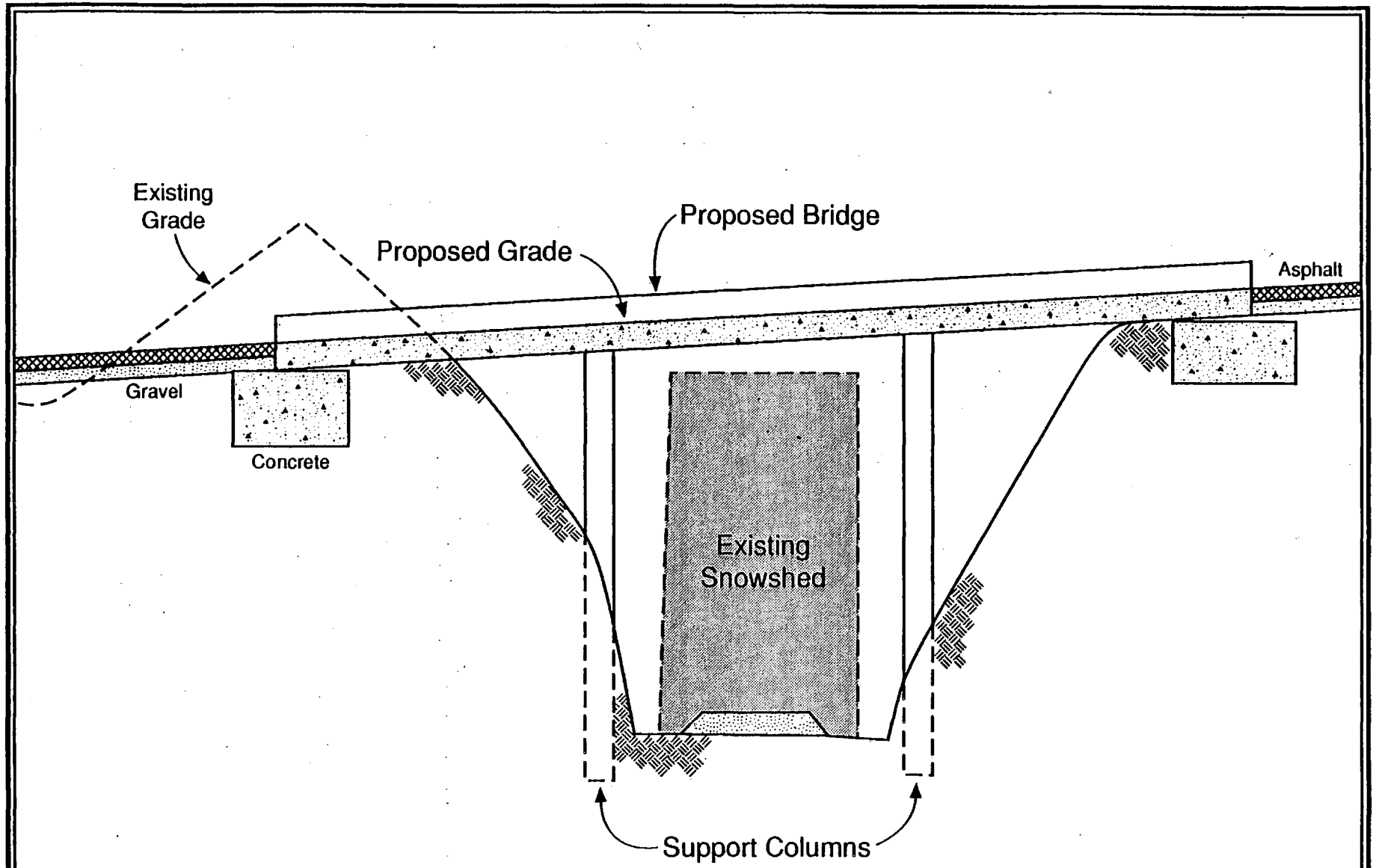
Comment #2-5
Traffic engineers used on this project stated that the section of road between proposed access road and existing Lake Mary Road intersection at Alpine Skills International is too steep to be used safely yet, proponents intend to bring Donner Summit traffic down that section of road to the proposed access road. Inconsistency in purpose and use.

RESPONSE:
As illustrated on Figure 3, the proposed Alternative 3A intersection is not located at the base of two grades but is, rather, located over 200 feet east of the base of the grades. Both entries to DSR parking facilities are, however, located at the base of these grades. The majority of inbound traffic (from the west) would descend the grade west of the DSR entry and would be on an upgrade prior to the right turn into the Sugar Bowl access road. Traffic inbound to Sugar Bowl from Donner Lake would be descending at a grade of about 5-6% grade prior to making a left turn into the access road entrance.

The proposed access road location as it relates to traffic congestion and hazards on Donner Pass Road is discussed in the Final EIS, Chapter IV, pages IV-170-188 and in Chapter VI, pages VI-93-95. The Final EIS identified one strength of Alternative 3A intersection placement as the resulting decreased speed at which departing motorists from Sugar Bowl would merge with departing DSR vehicles. Exiting Mt. Judah motorists would be going down a less steep grade and at a slower speed towards DSR. Donner Summit traffic represents a small proportion of total traffic to Sugar Bowl with the majority of vehicles arriving from the west.

Comment #2-6
Existing traffic on Donner Pass Road already at unsafe levels, problem will be exacerbated with increased use. Concern regarding conflict with turning movement into DSR south lot.

RESPONSE:
Traffic circulation and effects related to parking along Donner Pass Road were extensively treated in the Final EIS. Conditions at DSR, including turning movement conflicts at their south lot, were addressed in Chapter VI at page VI-94. Chapters III and IV of the Final EIS which include a detailed analysis of the existing and future parking conditions. In addition, other alternative parking scenarios are analyzed in these sections as well as in Chapter II under Sugar Bowl Alternatives. The proposed Sugar Bowl Ski Resort Master Plan includes the creation of a new off-street parking area that would accommodate the parking demands generated by the expanded resort on all but "peak" days.



Scale: One inch equals approximately 15 feet

GREYSTONE

Figure 2
BRIDGE CROSS-SECTION
LOOKING EAST

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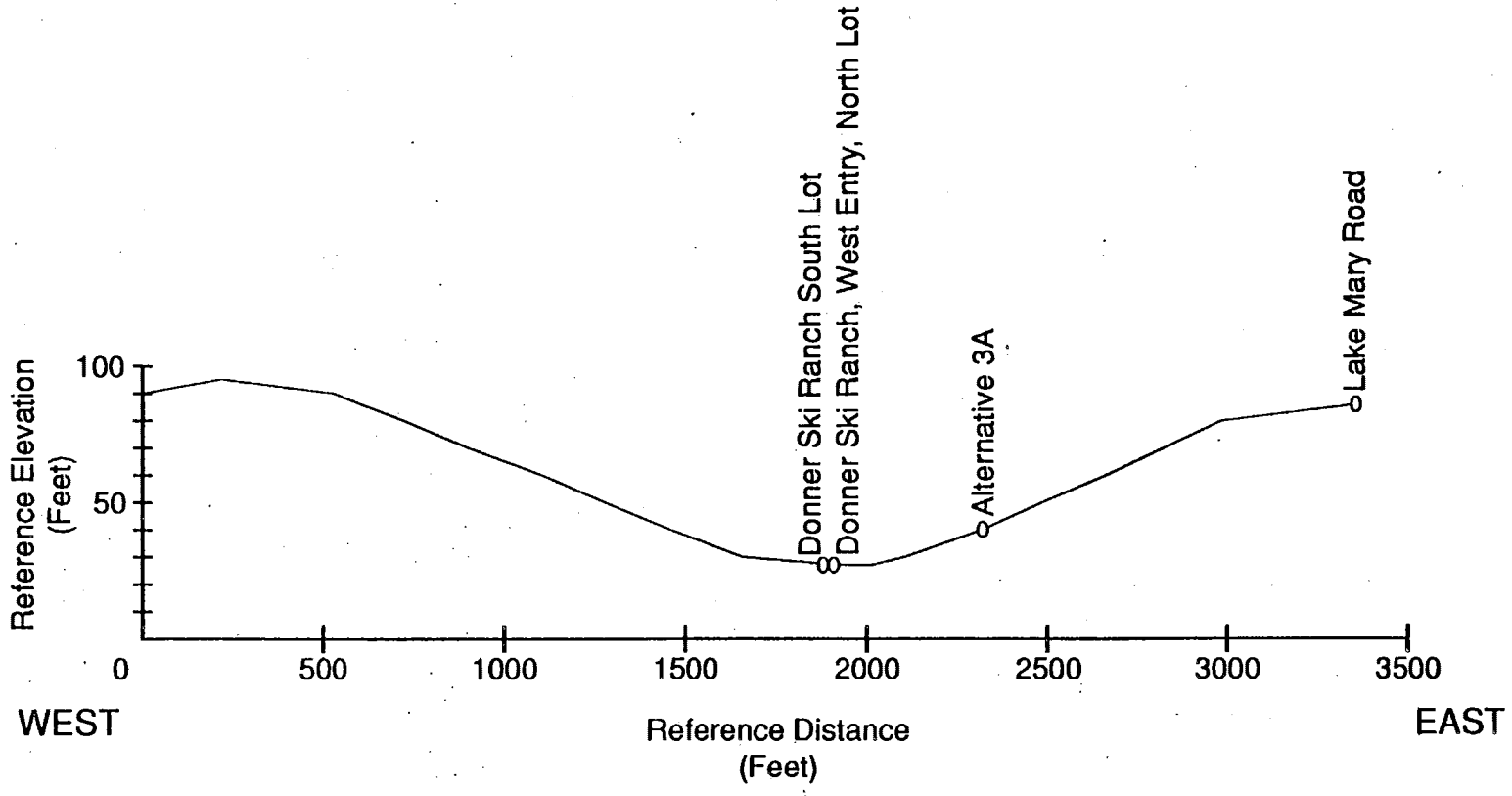

Note: Vertical Scale Exaggerated
Source: Topography Maps

GREYSTONE

Figure 3
DONNER PASS ROAD PROFILE

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Traffic on Donner Pass Road currently operates at Levels of Service (LOS) ranging from A to F. While not considered unsafe, traffic does become congested during peak use periods. However, traffic is very infrequently below LOS C and in fact, current peak traffic on Donner Pass Road is actually less than it was when the road provided the principal east-west route over the Sierra Nevada (prior to the construction of I-80).

There are basically two methods to reduce existing and/or future traffic congestion during those few days when traffic is heaviest and LOS is below C. One method is to provide additional roadway system capacity by constructing more travel lanes, improve intersections and use traffic control devices. The other method is to reduce the level of traffic and peak hour congestion by preparing and implementing programs called Transportation Management Plans (TMP). TMPs have a potential to mitigate traffic problems in a cost effective and environmentally sensitive manner. Eighteen potential mitigation measures including elements that could be included in a TMP are discussed in detail in the Final EIS on pages IV-204 through IV-239. Mitigation measures aimed at reducing congestion and traffic associated with parking are shown on pages IV-251 and 252.

This comment deals specifically with concerns associated with the entryway to Donner Ski Ranch's south parking lot. Two initiatives associated with the Sugar Bowl project would address this situation. The first of these, the Transportation Management Plan, would provide for the placement of traffic managers west of DSR during the AM inbound period and to the east of DSR during the PM exit period on peak days. The positioning of the traffic manager would provide both a warning to oncoming traffic that turning movements are occurring at DSR and an opportunity to influence the spacing of vehicles by periodically flagging them to slow or stop as needed. Second, Sugar Bowl proposes to remove an existing storage shed located immediately east of the existing south parking area entryway and to relocate the entryway eastward. The relocated entryway would provide a more gentle (less acute angle) turning movement and would allow expansion of existing parking capacity in the south lot. In addition, Sugar Bowl is proposing to provide replacement parking in the DSR south parking lot and to improve pedestrian access to the ticket windows of DSR.

Comment #2-7

Concern for DSR customers who park at their lower facility (south lot) and must cross Donner Pass Road in very congested traffic to gain access to DSR.

RESPONSE:

Potential effects of Sugar Bowl traffic on pedestrians bound for DSR were briefly addressed in Chapter VI of the Final EIS at page VI-94. Continuing dialogue between DSR, Sugar Bowl, and the Forest Service has helped clarify this and correlated concerns. The analysis in the Final EIS (responding to DSR concerns) focused on departing traffic. Donner Ski Ranch's comments on the Final EIS have now also focused on arrival traffic conflicts. Certainly, pedestrian traffic from Donner Ski Ranch's south parking lot under both existing or proposed circumstances is a serious consideration, and conditions will clearly be made more difficult as additional vehicle traffic is routed through the congestion point.

Anticipated traffic (both DSR and Sugar Bowl) is not, however, expected to present a significant limit to DSR patrons crossing Donner Pass Road. Cumulative eastbound AM peak hour traffic volumes west of DSR would be about 700 vehicles, averaging about 12 vehicles per minute, allowing more than adequate spacing for pedestrians to cross Donner Pass Road. As discussed in the Response to Comment #2-6, pedestrian

convenience and safety would be provided by transportation management controls which would be utilized to create gaps in the existing traffic stream on peak days. Traffic controls at the Alternative 3A/4 proposed intersection can be used to create gaps in the stream of departing traffic that will allow for safe pedestrian movement for departing DSR customers. The traffic control officer will have a direct view of most of the DSR parking lot which will allow this officer to anticipate the need to create these gaps. This advantage is reduced if the traffic officer is positioned at the Lake Mary Road intersection as discussed in the Final EIS, Chapter IV, Transportation and Circulation.

Pedestrian safety at this location can also be improved with marking and signing of designated pedestrian crossings. In addition, Donner Ski Ranch's shuttle service from their south parking lot to the ticket window area reduces pedestrian/vehicle conflict. DSR is encouraged to continue this shuttle system.

Comment #2-8

Existing and future traffic for both DSR and Sugar Bowl will be subjected to unsafe conditions when Sugar Bowl traffic is required to negotiate 90 degree turn onto new access road (particularly with adverse weather conditions during the winter).

RESPONSE:

This is a concern regarding arriving traffic. There would be no known conflicts between arriving DSR and Sugar Bowl traffic. The turning movements for DSR and Sugar Bowl (left and right turn movements) would occur at two different locations. For the majority eastbound traffic, the left turn into DSR would be the first-occurring movement. Assuming relatively low volume westbound traffic on Donner Pass Road, little conflict would occur, allowing essentially an unrestricted left turn into DSR. Remaining eastbound traffic would be limited mainly to Sugar Bowl patrons who would be free to make an unrestricted right turn onto the proposed access road. This would occur several hundred feet east of DSR entry/exit traffic. The proposed alternative 3A access road is located at the extreme easterly end of the DSR parking area. See Response to Comment #2-7.

This comment also raises an issue of eastbound traffic stacking behind inbound DSR traffic, implying that forced stops on the downgrade during icy conditions could be hazardous. As discussed above, inbound DSR traffic would have the opportunity to make an essentially free left turn into the parking area, minimizing the potential for backups. Should conditions prove hazardous, it would be possible to widen Donner Pass Road along the DSR frontage to provide a center turn lane to allow DSR patrons the opportunity to consider the left turn and allow eastbound Sugar Bowl traffic to proceed uninhibited.

Comment #2-9

Future expansion plans should be disclosed so that cumulative effects can be evaluated.

RESPONSE:

Several cumulative impact scenarios, described in Section F of Chapter II of the Final EIS, were utilized to provide a comprehensive picture of potential environmental impacts under a wide range of future conditions. While Sugar Bowl has no specific future expansion proposal, Chapter II discusses a cumulative impact scenario which includes development of 800 additional residential units, or their equivalent, in the Donner Summit area; the scenario includes a small amount of downhill ski expansion and some commercial development. The potential for additional development at the

Sugar Bowl Resort was specifically referenced in this section, and the cumulative scenario was been used throughout the Final EIS to evaluate cumulative impacts associated with the project. The Sugar Bowl EIS included a Transportation Management Plan (TMP) which Sugar Bowl has agreed to implement. Royal Gorge has also agreed to implement this plan.

This scenario would more than account for potential for additional development at Sugar Bowl. Sugar Bowl has purchased additional sewage capacity from DSPUD, but this capacity would limit development potential to between 50 and 60 new residential units. Traffic associated with these additional units is addressed by the cumulative scenario, and in addition, would not significantly impact the peak hour traffic volumes associated with skiing.

Sugar Bowl currently has no plans for further expansion in connection with the Royal Gorge nordic resort. Nordic ski trails currently exist between the two resorts and are utilized by Royal Gorge patrons. In addition, Royal Gorge's Olympic Village proposal includes the development of a chair lift which would facilitate movement of nordic skiers between the two resorts. This lift is primarily designed to support use of Royal Gorge's existing trail system.

Comment #2-10
Have been advised that Sugar Bowl has plans to widen road in front of DSR, resulting in the loss of on-street parking for DSR' customers. Resulting economic impact to DSR not addressed in the EIS.

RESPONSE:
There are no plans to widen Donner Pass Road at DSR except as discussed in Response to Comment #2-8. During the course of the traffic analysis, the construction of an unrestricted right turn lane directing traffic onto the proposed access road was considered. However, the analysis indicated that it was unnecessary. Nevertheless, Sugar Bowl is currently exploring options for replacement parking as mitigation for any impacts on DSR parking, if they occur. Replacement of any parking lost will avoid direct economic impacts on DSR. Refer also to the Response to Comment #2-6.

Comment #2-11
What will keep Sugar Bowl from parking cars in the bus parking spaces? Questions of enforcement of proposed parking scenario.

RESPONSE:
Pursuant to Placer County Department of Public Works requirement of forced transit usage, and the large anticipated energy expenditure required of Sugar Bowl to achieve the 14% target bus patron use, Sugar Bowl will ensure through parking lot controls, that the parking designated for bus use will be only used by buses.

Comment #2-12
What safeguards are there to keep them from turning both sides of the access road into a parking lot for an additional 1,000 cars?

RESPONSE:
The proposed access road has been designed to serve roadway purposes only and includes two twelve-foot travel lanes and four foot shoulders. Space provided by the proposed roadway is adequate only for two-way travel, and the travelled way would need to be maintained at all times. Parking cars along the proposed access road would

be inconsistent with the description of the project which would be the subject of approvals by the Forest Service, Placer and Nevada Counties. Parking use would be inconsistent with mitigation measures proposed to limit traffic effects by limiting parking capacity at the resort.

Comment #2-13
What assurances are there that Sugar Bowl will comply with requirements imposed on the proposed project?

RESPONSE:
The proposed expansion project will be subject to post-approval monitoring not only by the Forest Service but also by both Nevada County and Placer County. The Final EIS includes a detailed mitigation monitoring plan setting forth each of the mitigation requirements and establishing accountability for their enforcement. These mitigation measures will be incorporated into an Operations Plan to be reviewed and approved by the Forest Service prior to the beginning of construction.

Comment #2-14
Adverse economic impact to DSR was never addressed. Completely overlooked existing and future business volume and associated traffic generated by DSR. Donner Ski Ranch customers may be put off by increased traffic and go elsewhere to ski. Project has major impact on operating and economic viability.

RESPONSE:
DSR is not likely to lose customers either directly to Sugar Bowl or as a result of perceived or real traffic congestion problems. Rather, they stand to potentially increase ticket sales because of the additional customer exposure to the differences in pricing structure and variety of ski terrain. Donner Ski Ranch's operations costs will likely be increased because of increased need for traffic attendants and increased frequency of the shuttle service from their south parking lot. Although it is not the burden of the Final EIS preparers to assure that the difference between these new revenues (additional ticket sales) and increased costs balance, the Forest Service believes that DSR will likely receive a net profit as a result of this project.

Traffic studies included in the Draft EIS and expanded in the Final EIS considered peak traffic volumes associated with all existing ski area operations, existing residential development, and non-residential traffic generators in the Donner Summit area. Donner Ski Ranch's statements indicate that business volume has been expanded without expansion of parking capacity, and as a result, have not increased peak traffic volumes. Recent marketing efforts by DSR have focused on the attraction of mid-week skiers using reduced lift ticket pricing. As a result, increases in DSR traffic are occurring during periods when Sugar Bowl traffic is at minimum.

Considering traffic information generated in the EIS process together with proposed Transportation Management Programs to be instituted with the proposed expansion, it does not appear that the DSR patrons would be subjected to severe or major traffic delays. Inbound traffic in the mornings would not exceed roadway capacity, and improvements proposed by Sugar Bowl would facilitate eastbound traffic movements from Interstate 80 to both DSR and Sugar Bowl. Exiting traffic from DSR would be uninhibited. On peak days, exiting traffic from Sugar Bowl would be subject to a variety of transportation controls designed to ensure that the capacity of the Soda Springs on-ramp to Interstate 80 is not exceeded. Thus, controls imposed on the

Sugar Bowl project would act to ensure that DSR patrons and others exiting from the Donner Summit area on peak skiing days, would not be subject to major delays.

Comment #2-15

DSR did not receive a copy of the Final EIS in a timely manner and technical appendices were not available to DSR when requested.

RESPONSE:
The Forest Service has apologized for this inadvertent delay.

Comment #2-16

This comment presents DSR's recommendation that the Forest Service "not adopt the Preferred Alternative" and requests reconsideration of impacts associated with exiting traffic and economic impacts associated with the proposed access road.

RESPONSE:
This portion of DSR's letter summarizes concerns outlined in other portions of their comment and reiterates their opposition to the proposed access road. Responses to the issues referred to in the this comment (traffic and economic impacts) are addressed in previous responses to DSR comments, in particular to Comments #2-3 through 2-6 and comment #2-10.

Here, as in other portions of the comment, DSR has implied that they have been neglected in the master planning, environmental impact analysis, and decision-making process. As described in the introduction to the responses to this commentor (page 1), DSR was either consulted with, or had the opportunity to provide input to, the planning process during scoping, Draft EIS preparation, Draft EIR review period, and after publication of the Final EIS. A detailed discussion of these opportunities is provided in the introduction to this set of responses.

Since publication of the Final EIS, the Forest Service has met with DSR officials with regard to their concerns as addressed in this comment letter, and these concerns have been discussed extensively with the Forest Service's EIS consultants, project traffic engineers, and Placer County and Nevada County officials. These discussions included detailed reconsideration of the Lake Mary road access option versus the Alternative 3A access option. Using information developed in the Final EIS as a base, Table 1 was developed to summarize the effects associated specifically with these access options as a tool for reconsideration and decision making. As the table illustrates, the Final EIS identifies notable margins of environmental risk between the Lake Mary and Alternative 3A access options. Of primary concern are potential threats to the waters of Lake Mary as a result of road construction and maintenance activities, additional potential for disturbance of existing recreational activities, including backcountry skiing and PCT use, and impacts on residential land uses adjacent to the Lake Mary road option. In revisiting this analysis, it is clear that the impacts associated with either access option can potentially be mitigated. However, the cumulative risk of environmental harm is judged to be less under the Alternative 3A access option than under the Lake Mary road access option.

TABLE 1

ENVIRONMENTAL IMPACTS OF ACCESS OPTIONS

Environmental Issue	Lake Mary Road (Alternative 2) Access Option	Alternative 3A Access Option
Construction		
Amount of construction	0.4 miles reconstruction	0.2 miles new construction, bridge
Physical disturbance (soils, vegetation)	Widen existing road, more length, 0.9 acres	New construction, shorter length, 0.9 acres
Blasting requirements	High	High
Geology/Soils	Similar	Similar
Water Resources, risk to Lake Mary, other important water resources	High	Low
Steep side slopes adjacent to surface waters	Yes	No
Low separation between construction, operation and lake	Yes	No
Risk of escaping rock, debris and silt during construction	Yes	No
Risk of toxic release to lake during construction (gas, oil, asphalt, grease, construction chemical)	Yes	No
Risk of SPP petroleum products pipeline rupture, release to Lake Mary, aquatic systems damage, drinking water contamination, aesthetic damages, extraordinary prevention costs	Yes	No
Release of road salt, de-icing chemical to Lake Mary; or drainages discharging directly to Lake Mary	Yes	No
Urban runoff discharge to Lake Mary, or drainages discharging directly to Lake Mary	Yes	No
Wetlands	Isolated wetland near Lake Mary cabin access	Small isolated wetland near Lake Mary Road
Air quality	Similar	Similar
Land use/residential uses		
Blasting disturbance during construction	Major	Minor
Substantial new traffic adjacent to residential area	Yes	No
Exposure to traffic, snow removal noise	Yes	Lower

Exposure to trespass, vandalism	Increased	No change
Reduced summer privacy (vegetation removal)	Yes	No
Reduced winter seclusion (i.e. ski-in only)	Yes	No
PCT, encroachment on PCT trailhead	Yes	No
Nordic skiing		
Skiers inclined to traverse Lake Mary cabin area	Yes	No
Reduction in available parking	Yes, at Alpine Skills International and along Donner Pass Road	No
Elimination of Lake Mary Road as ski trail	Yes	No
Skiers must cross access road to access terrain	Yes, most	Yes, some
Cultural resources	Similar	Similar
Visual resources		
Significant impacts	None	None
Degraded views for Lake Mary Road users due to increase in cleared width, larger cuts	Yes	No
Impact on snowshed views from Donner Ski Ranch	None	None
Noise, receptors affected by traffic noise	Residences along Donner Pass Road, Lake Mary Road	Residences along Donner Pass Road
Population and housing	Similar	Similar
Utilities and Services	Similar	Similar
Police and fire services	Longer response time	Shorter response time
Transportation and Circulation		
Driver convenience	Winding road, sharp turns, steep sections; unnecessary elevation gain/loss	Gentle curves, moderate grades, moderate elevation gain and loss
Construction difficulty related to extraordinary care required regarding SPP petroleum products pipeline, AT&T fiberoptic cable, prevention of sidecast and blasting debris to Lake Mary	High	Minor, at crossing of pipeline, cable alignment
Maintenance/snow plowing/storage	0.4 miles	0.2 miles
Additional Intersection	No	Yes

Access road grades	Typical grades to. 6%, some sections >10%	3-6%
Intersection approach grades Donner Pass Road	Slight upgrade to near level	Short upgrade
Access road	Level	Slight downgrade
Slip-and-slide concerns	None	None
Merge conflicts, arriving traffic	None	None
Merge conflicts, exiting traffic, westbound	Exit opportunities for DSR patrons limited by Sugar Bowl volumes	Same
Exiting speeds along Donner Ski Ranch	Moderate	Slower, due to intersection control
Opportunity to manage merge conflicts under Sugar Bowl TMP	Limited	Ideal
Vehicle/pedestrian conflict, DSR south lot	Yes	Yes
Sight distance, exiting traffic	Adequate	Adequate
Local economy	Similar	Similar
Fiscal effects		
Additional public road maintenance costs	Yes	No
Property tax revenues	No change	Increased, due to increased private improvements (road, bridge)
Development economics	Similar	Similar
Pipeline/cable relocation costs (see note #2)	Substantial	Minor

Notes:

1. This table compares the environmental impacts related to construction and operation of the portion of the Alternative 2 and Alternative 3A access roads north of their intersection. Alternative 2 involves reconstruction of approximately 0.4 miles of the existing Lake Mary Road and is known as the "Lake Mary Road Access Option". Alternative 3A involves construction of a new road south from Donner Pass Road and is known as the "Alternative 3A Access Option".
2. Rupture of the SPP petroleum products pipeline involves significant potential for long-term environmental damage. The pipeline owner has advised Sugar Bowl representatives that re-bedding of the existing pipeline will be required in order to adequately ensure that blasting activities will not cause damage to the pipeline facility. AT&T also advises that substantial protections will be required to protect communications cable and related equipment.
3. Primary information sources: Final EIS, Sugar Bowl Ski Resort Master Plan, May 1992; , Anderson 7/13/92

Commentor #3
James Messersmith, Regional Manager
Department of Fish and Game, Region 2
1701 Nimbus Road Suite A.
Sacramento, Ca. 95670

Comment 3-1
"Proposed 'Modification of Treatment Procedures' and the discontinuation of the pruning of an equal acreage of alder/willow habitats on adjacent private lands currently impacted by ski facility operations are inadequate, due to the ability of the proposed project to avoid impacts."

RESPONSE:
The Department of Fish and Game (DFG) indicates that it disagrees with the technical conclusion of the Final EIS but does not provide technical data to support its disagreement. Instead, the DFG indicates that impacts should be avoided. The conclusions of the EIS were developed after extensive study of the wildlife and other values associated with alder/willow habitats on Mt. Judah. Specifically, the EIS incorporated the findings of a study of potential impacts on alder/willow habitats, and options for minimizing or avoiding these impacts (Jones & Stokes Associates, 1991). A copy of the technical study documenting these conclusions is included in the technical appendices to the Final EIS, a copy of which was provided to the DFG.

Where ski trails cross alder/willow stands, pruning is necessary in order to achieve an adequate opening date when pre-opening natural snowfall has not been sufficient to cover alder/willow stands. Normally, this requires several feet of natural snowfall and may not be achieved until after January 1 in low-snowfall winters. Both the Draft EIS and the Final EIS explored alternatives to alder/willow stand pruning, and the proposed Alternative 3A represents what the Forest Service considers to be the best alternative in an overall resource management context. Avoidance of alder/willow stands would require additional timber removal and impacts on habitats of equal or greater wildlife value. Compensation for proposed pruning by elimination of existing pruning on comparable stands is viewed as a practical means of avoiding environmental harm.

Comment #3-2
Failure of this project to comply with the Tahoe National Forest Plan with regard to riparian and meadow groups as set forth in the plan for the Tinkers Management Area.

RESPONSE:
The Forest Service acknowledges that the willow/alder pruning actions is in conflict with Standards and Guides #46, Riparian Area/Perennial SMZ Management and #47, Intermittent/Ephemeral SMZ Management. This conflict and its resolution is discussed in the "Forest Plan Consistency" section of the Record of Decision. This discussion highlights efforts to minimize effects on the subject habitats.

Commentor #4
Joseph R. Schwab

Comment #4-1
Safety issue related to 292 on-street parking spaces on Donner Pass Road which require drivers to back out directly onto the roadway was not addressed.

RESPONSE:
Safety hazards associated with Donner Pass Road parking are addressed in Chapters III, pages III-139-142 and IV, pages IV-240-252 of the Final EIS where a detailed analysis of the existing and future parking conditions are assessed. In addition, other alternative parking scenarios are analyzed in these sections as well as in Chapter II under Sugar Bowl Alternatives, pages II-30, -51, -61, -64, -68, and -77.

Existing on-street parking spaces have been lawfully permitted for use by Sugar Bowl under Placer County regulations and are subject to significant existing use. Implementation of the proposed project would reduce the number of parking spaces and frequency use of these areas, thereby reducing conflicts between through traffic and backing movements. The project would reduce existing impacts, not make the situation worse.

The proposed Sugar Bowl Ski Resort Master Plan recommends the creation of a new off-street parking area that would accommodate the parking demands on all but "peak" days. Thus, ample parking would be provided for typical days and the spaces in question would be the last to fill, necessary only on the busiest of days after all other space is utilized. In addition, the proposed project involves the elimination of 121 existing shallow on-street parking spaces in the gondola vicinity. Elimination of these spaces would reduce existing parking/roadway conflicts. This, in combination with the new Mt. Judah parking facility, would reduce parking activities in the vicinity of Donner Pass Road to a minimum on all but peak days. Sugar Bowl has also made the commitment to plow a sufficient width to maintain a four-foot pedestrian walkway along Donner Pass Road and will also provide a shuttle service to move skiers from the parking areas to the ticket windows on peak days.

Comment #4-2:
I urge you to increase the Judah parking area and reduce the on-street parking near the gondola portal.

RESPONSE:
This comment is a recommendation to Placer County which prescribed the reduction in size of the Alternative 3A parking area.

Comment #4-3
Elimination of 286 parking spaces at the Judah parking area moves traffic problem elsewhere as increased traffic searches for another parking location.

RESPONSE:
This measure will limit the overall parking capacity of the resort and, ultimately the associated traffic. See Response to Comment 4-1.

Comment #4-4
No maps were provided that detail proposed traffic mitigation measures (specifically, the road improvements including a left turn land on westbound Donner Pass Road, an acceleration lane or center turn lane on Donner Pass Road, off street parking areas, etc).

RESPONSE:
Proposed improvements were described in the Final EIS. Maps have been developed by the engineers for the project to illustrate proposed traffic mitigation measures and have been provided to the commentor. These drawings are available for review at the Truckee Ranger District Office and the DSPUD office.

Comment #4-5
Final Transportation Management Plan should be made available to the public. Residents along Donner Pass Road within Nevada County will be required to seek action from different county (Placer).

RESPONSE:
A Transportation Management Plan (TMP) is currently in preparation. The basic components are described in the Final EIS Chapter IV "Transportation and Circulation" section, pages IV-204-219. A copy of the TMP will be made a part of the permits for the project and will be available for public review at the Tahoe National Forest and both Placer and Nevada Counties offices. Since Donner Pass Road crosses into both counties, both Placer and Nevada County have and will continue to be involved in the review, approval, and implementation process for the TMP.

Comment #4-6
Proposed night skiing will have adverse impact with regard to noise and traffic by prolonging the period during a given day that residents are exposed to traffic and noise levels.

RESPONSE:
Night skiing was suggested by Caltrans as a way to reduce peak PM traffic flows on I-80. A sample survey of Boreal night skiing indicated that night skiing could reduce peak hour departures by 15-30%. This potential reduction in peak hour trips would for Alternative 3A translate to a low of 73 to a high of 146 vehicles on an average weekend and on a peak weekend potential reduction of peak hour trips could range from 134 to 267 vehicles. Volume on a daily basis would remain essentially the same but would be extended over a longer period of time. Off-peak traffic (i.e., departing night skiers) would involve additional traffic during hours when Donner Pass Road is lightly used. However, traffic associated with departing night skiers is expected to be minimal. While there would be some noise associated with departing night skiing traffic, noise levels are anticipated to fall well within existing county noise standards for all receptors along Donner Pass Road.

Comment #4-7:
Final EIS does not provide for adequate traffic mitigation measures.

RESPONSE:
Comment registers an opinion on the adequacy of traffic mitigation measures but does not identify any specific inadequacy.

Comment #4-8
Concerned about the validity of assumptions upon which the sales tax revenue projection was based. Projected revenue to be used for increased road maintenance. (See Table IV-68) additional $74,320 in revenue would require day skiers to spend in excess of one million dollars.

RESPONSE:
Sales tax projections were based on projections of skier off-site spending which would indeed generate more than $1.0 million in sales. These projections, which involve standard methodologies, are described on pages IV-255-257 of the Final EIS. Off-site spending is expected to occur both in and outside the Donner Summit area to benefit both Placer and Nevada County. The majority of visitor spending is, however, expected to occur in Nevada County, as reflected in projected sales tax revenue increases for the two counties shown on page IV-267 of the Final EIS.

The issue is market share of spending within the County, in this case Nevada County, as a result of expansion, not just in the Donner Summit area by day skiers. The projections accounted for all off-site spending associated with ski area expansion, including expenditures for overnight accommodations, meals, gasoline, and other purchases, the majority of which would occur within Nevada County, including the Truckee community.

Comment #4-9:
Postpone posting your final decision until Traffic Management Plan is issued to the public with adequate time for review.

RESPONSE:
Both the Draft EIS and the Final EIS outlined the contents and provisions of the Transportation Management Plan. Both documents have been made available for public review, and the mitigation measures adopted in the Final EIS would become a part of the TMP. Traffic management on Donner Pass Road is under the jurisdiction of Nevada County and Placer County, and these agencies will both oversee the development, approval, and implementation of the TMP.

Commentor #5
John Haliwell

Comment #5-1
Letter dated October 1990 was not seriously considered as part of the review of the Draft EIS. DSR will continue to use whatever means necessary to stop development of the Sugar Bowl access road as proposed.

RESPONSE:
Comment letter from Mr. Haliwell was reviewed in detail and responded to on page VI-93 of the Final EIS. The relative merits of Alternative 3A vs. Lake Mary Road (Alternative 2) access option were evaluated and addressed in the Final EIS, Chapter II and the access roadway alignment was further addressed in Chapter IV, pages 183-185. Additional analyses evaluating the two alternatives in question is contained in Response to Comments from Commentor #2.

Roadway snow removal and storage is the responsibility of Sugar Bowl. Storage areas are shown on the road improvement plans on file with Placer County. Adequate area is available adjacent to the access road for snow storage so no additional property acquisition is necessary. Please refer to Response to Comment #2-1 and 2-3 for visual impact analysis. The analysis described in these responses indicates that there will be no significant effect on visual resources in the area as a result of the proposed project.

Commentor #6
Jim Zellers

Comment #6-1
Mountain bikers use of jeep trail leading from Lake Mary not considered.

RESPONSE:
Mountain bike usage is discussed in Chapter III of the Final EIS, page III-92. The Forest Service is aware that the jeep trail is frequently used by mountain bike riders even though no public right-of-way exists at either end of the road. Implementation of the Sugar Bowl Master Plan will have the following influences on the mountain bike experience:

- *The jeep road may need to be closed to all public use during several phases of construction to prevent hazards to recreational users. Typical examples of this conflict would include blasting, tree falling, log hauling, and chair lift construction.*

- *The recreation setting will be altered along a portion of the jeep road. These impacts are associated with chair lift construction and ski trail development in the immediate foreground of the jeep trail. These disturbances will not be screened from the views of the mountain bike users.*

- *There will be increased vehicle traffic on this jeep road from project construction and maintenance activities.*

Comment #6-2
Will mountain bikers still be able to ride the jeep road if Mt. Judah Loop Trail also uses same road for part of the way?

RESPONSE:
Yes. While ski lift and ski trail development will occur in the vicinity of the jeep road, and while a portion of the jeep trail will be used as a route for the Loop trail, the status of the jeep trail will remain the same. Existing uses of the jeep trail will not be precluded by the project.

The Final EIS Summary Table provides a comprehensive list of all mitigation measures and monitoring program. The three monitoring agencies identified are the Forest Service, Placer County, and Nevada County. The Forest Service, specifically the Tahoe National Forest Truckee District staff, will be responsible for monitoring the project components that occur on public land, including work in the vicinity of the PCT, while Placer and Nevada Counties will be responsible for monitoring the project components which occur on private land.

Construction of ski lifts and trails in the vicinity of the PCT, due to the sensitivity of this resource, will be closely monitored by Tahoe National Forest staff. As a result, the likelihood of non-compliance with mitigation measures for this area is limited, and if some non-compliance does occur, the extent of damage would also be limited. Should some inadvertent equipment use occur within the PCT zone, or other damage to the resource occur, the Forest Service would anticipate imposing requirements on the contractor which would result in immediate repair of any damage and the most rapid revegetation of the disturbed area as possible. The Forest Service does have the authority to require Sugar Bowl to provide a performance bond. This requirement has been used to assure that mitigation measures and design requirements are implemented. Ultimate penalties for non-adherence to mitigation measures included in the Final EIS would be revocation of the ski area's permit to utilize National Forest System lands.

Comment #6-7

Why is it ok to build ski lifts and runs across the PCT when bikes are excluded from it?

RESPONSE:

Both the Draft EIS and the Final EIS contained extensive discussion of the plans, laws, and regulations applicable to management of the Pacific Crest Trail. Rather than creating a preservation corridor, the PCT is designated as a recreational facility which is to harmonize with other uses of the land. Please refer to pages III-93-96 and IV-110-118 of the Final EIS. In juxtaposition, the PCT is closed to mountain bike use by Regional Forester's Order #88-4. This order was executed concurrently with the Regional Foresters of the Pacific Southwest, Pacific Northwest, and Intermountain Regions on August 31, 1988.

The Regional Forester considered the advice of the PCNST Advisory Council which recommended that bicycles be prohibited on the PCT. The council took this action since the trail was designated primarily for foot and equestrian use and the trail goes through many wilderness areas. The Regional Foresters were joined by the Bureau of Land Management, National Park Service, and California Department of Parks and Recreation in accepting the position of the PCNST Advisory Council.

Locally the Closure Order had the immediate effect of interrupting use patterns that had rapidly become established. Mountain bike enthusiasts had quickly learned that riding the PCT or using the PCT as a connection between other trails or roads would provide a high quality experience. The Order does provide hikers and equestrian users an opportunity to avoid contact with mountain bikers and the closure action does leave the vast majority of local trail and dirt roads available to hiking, biking, and horse riding. Additional trail construction is underway and plans for more construction (that can address the losses that mountain bike riders feel) are proceeding. Mountain bike enthusiasts continue to be encouraged to join in this trail planning process. Providing there are no overriding environmental considerations, the Forest Service is willing to consider developing a "single track" trail from the jeep road to public roads near Lake Mary.

Comment #6-3
The idea that skiing is growing is simply untrue.

RESPONSE:
The growth in demand for downhill skiing and the need for expanded downhill ski facilities has been the subject of much controversy and debate. Accordingly, this subject was treated extensively in Chapter I of both the Draft and Final EIS, including discussion of opinions on both sides of the issue. Further discussion of the issue is also included in the Final EIS, Chapter VI Response to Comments, pages VI-18 through VI-19.

Comment #6-4
Will the 12-15 peak traffic days per year increase with increased use and traffic on Donner Pass Road?

RESPONSE:
Currently, peak traffic days on Donner Summit Road occur during a few recognizable holiday periods (i.e., the weekends surrounding Christmas, New Years, Presidents' Weekend, Martin Luther King's Birthday). While overall traffic operations are influenced by factors other than skier volume (i.e., weather, road conditions), relatively high ski area utilization (i.e., greater than 2,000 skiers at Sugar Bowl) occurs on these approximately 12 to 15 days each year.

The extent to which currently non-peak days may in the future experience peak traffic is dependent on many factors, including the extent of activity at other resorts on Donner Summit Road, weather conditions, traffic conditions on I-80 and the effectiveness of the Sugar Bowl mitigation package. While it is reasonable to expect that some increase in the number of peak traffic days may occur, the potential increase is not viewed as significant within the context of the overall 130-day ski season.

It is also important to note that the Sugar Bowl mitigation program is flexible. The program can be implemented in response to peak traffic conditions, whenever they occur. The program will be demand responsive and will be monitored by Placer and Nevada Counties on an annual basis to insure that traffic flow objectives are met.

Comment #6-5
Snow removal and storage from the parking area was not addressed.

RESPONSE:
Snow removal and storage from the parking area is discussed in Chapter IV of the Final EIS page IV-21. This discussion included consideration of the potential water quality effects of vehicular pollutants contained in plowed snow. Snow storage areas would be unpaved and during snowmelt, the runoff would be captured by the proposed drainage system and routed through the storm water/sediment detention basin resulting in treatment prior to discharge to the South Yuba River. Preliminary parking lot plans submitted to Placer County show areas designated for snow storage.

Comment #6-6
Who will monitor construction of the expansion, and if the guidelines for building near the PCT are broken what happens?

RESPONSE:

Comment #6-8
Will the bridge on Donner Pass Road near the lookout to Donner Lake be saved?

RESPONSE:
Yes, in fact, the bridge is listed on the National Register of Historic Places. Independent of the proposed project, Nevada County is actively seeking means of maintaining this structure in a way that will protect its historic significance.

Comment #6-9
What are the guidelines for 'clean' with relation to Sugar Bowl cleanup in the summer near the PCT?

RESPONSE:
The subject of litter is a concern everyone shares. As with construction in the PCT vicinity, annual cleanup of this area will be closely monitored by Forest Service winter sports staff. There is no specifically defined standard for litter removal. The Forest Service considers its standard for "clean" to be no visible debris from the downhill skiing use.

Comment #6-10
What determines when it is necessary to make snow?

RESPONSE:
If adequate snowfall does not occur by the target opening day, (typically Thanksgiving) than resort operators may rely on snowmaking equipment to provide an adequate base coverage. To ensure a Thanksgiving opening day, Sugar Bowl Ski Resort will normally require 12-18 inches of packed snow on the groomed trails. This requires approximately 24-30 inches of snowfall during the month of November. After consultation with other resort operators in the area, Sugar Bowl estimates that snowmaking activity will occur approximately 250 hours per season for a typical year, with the majority of these hours during the months of November and December. It should be noted that snowfall records from 1970 to 1990 indicate that only four Novembers involved less than 24 inches of snow at Sugar Bowl.

Comment #6-11
Is the west slope of Mt. Judah appropriate ski terrain and are the typical snow conditions good for beginner and intermediate skiers?

RESPONSE:
The suitability of snow conditions for the proposed use was analyzed in both the Draft EIS and the Final EIS. Please refer to page VI-51 of the Final EIS. Field observations in May of 1990 and 1991 confirm that the terrain proposed for use on the west slope of Mt. Judah (without the benefit of grooming, compaction or snowmaking) remained suitable for skiing even after the resort had closed for the season. The snow texture (surface) remained satisfactory during some of the most adverse conditions. This area has been monitored semi-monthly by Forest Service representatives and/or Sugar Bowl Ski Patrol. The terrain is appropriate for the targeted segment of skiers.

Comment #6-12
What happens if the parking lot catch and containment of runoff system fails and pollutes the neighboring wetland?

RESPONSE:
Urban runoff was discussed extensively in the Water section of Chapters IV and VI of the Final EIS. Urban runoff pollutants are managed with BMPs (Best Management Practices) identified by the U.S. Environmental Protection Agency. BMPs are designed to accommodate site specific conditions and account for the complexity and physical and biological variability of the natural environment. The BMPs incorporate 75 years of erosion control and watershed protection experience and are based on sound scientific principles.

Oil and grease traps will be installed in the drainage system collectors in the proposed parking area, all runoff will be routed through runoff detention/sediment retention basin which will entrap other pollutants as well. A routine maintenance program will ensure that urban runoff features continue to function as designed. Additionally, runoff from the parking area will be controlled by mitigation measures required by the Placer County Land Development Manual as described in the Soils section of the Final EIS. Due to the seasonal aspect of parking lot use and the capacity of the detention pond containment feature, the likelihood that pollutants from a spill in the parking lot area would make their way to the wetland is considered very slight.

Comment #6-13
Will Sugar Bowl put money up front for pay raises to their employees?

RESPONSE:
Unrelated to the Final EIS. However, Sugar Bowl's employee housing programs are discussed in the Final EIS, pages IV-158 and VI-81.

Comment #6-14:
Proposed project would facilitate expansion of Sugar Bowl into Coldstream Canyon.

RESPONSE:
The subject of expansion into Coldstream Canyon was discussed extensively in Section C of Chapter II of the Draft EIS and the Final EIS. This discussion noted that expansion into Coldstream Canyon was an alternative to the proposed Mt. Judah expansion as access into the drainages already available from existing ski trail development along the east flank of Mt. Lincoln. This discussion in the Final EIS notes the significant potential environmental consequences of expansion into this area. The Record of Decision sets forth the Tahoe National Forest's decision to proceed with the process that will amend the Tahoe National Forest Land and Resource Management Plan direction relevant to future downhill ski planning in the headwater area of Coldstream Canyon.

Comment #6-15
Opposes cutting any pristine forests.

RESPONSE:
Provides commentor's opinion on acceptability of previously-identified environmental impacts. See Response to Comment 11-2 and a discussion of old growth impacts included in the Final EIS, Chapter IV pages IV-44-48. The discussion contains a detailed assessment of impacts, finding that old growth resources would not be

significantly affected. A discussion of existing disturbances on Mt. Judah can be found in the Final EIS, Chapter III pages III-93-96 and III-99-107

Comment #6-16
Should the wetlands be avoided since there are so few remaining?

RESPONSE:
The commentor's concern for wetland resources was reflected in both the Draft EIS and the Final EIS which included extensive discussions of the extent of wetland resources on the project site as well as their relative sensitivity. Alternative 3A was identified as the Preferred Alternative partly due to its effectiveness in minimizing wetland impacts. Mitigation measures for the project include a wetland mitigation plan. The Wetland Mitigation Plan for the Sugar Bowl project provides for the creation, expansion or restoration of approximately 1.55 acres of wetland at six sites. The plan will ensure "no net loss" of wetlands or wetland values as a result of the project as outlined. A copy of the plan is included in the Appendix of the Final EIS.

Comment #6-17
How can I trust you to make sound decisions that will not be proven wrong somewhere in the future?

RESPONSE:
The decision will be based on the best information that is available.

Commentor #7
Monica Hansen

Comment #7-1
What if another marketing company did a study on growth of skiing and found the opposite of Sno-engineering?

RESPONSE:
Similar study done in 1991 by EIP for Alpine Meadows indicated results consistent with those provided by Sno-engineering. See Response to Comment 6-3.

Comment #7-2:
Project would block unobstructed route to backcountry involving exposure of backcountry skiers to avalanche danger on the east side of Mt. Judah. Downhill skiing development would make backcountry use less desirable.

RESPONSE:
Both the Draft and Final EIS's included substantial discussions of impacts of the project on backcountry skiing. A substantial number of comment letters on the Draft EIS also address these issues and the Response to Comments section of the Final EIS, Chapter VI, includes extensive responses to these comments. The EIS and the Response to Comments indicate that the proposed project would not obstruct backcountry access routes. A condition on the proposed project would insure that access to the backcountry remains open at all times. Backcountry skiers would not be

forced to traverse the east side of Mt. Judah. Effects of the project on the aesthetics of backcountry skiing were extensively addressed.

Comment #7-3
Who will monitor and what are the penalties for Sugar Bowl not cleaning up adequately in the summer?

RESPONSE:
See Response to Comments 6-6 and 6-9.

Commentor #8
Bill Sinoff

Comment #8-1
"I feel as though Mt. Judah is a corridor escape route into a wilderness type setting. I want to see Mt. Judah and the surrounding area stay as it is."

RESPONSE:
While the proposed project area supports substantial recreational use, it does not contain wilderness values. The project vicinity is roaded, has been logged extensively, and is adjacent to development at the existing Sugar Bowl resort as well as various other types of development in the Donner Summit area including major transportation facilities. General land ownership patterns and existing land use is discussed in Chapter III of the Final EIS pages III-69-76. Refer to Response to Comment #6-7.

Comment #8-2
What provisions are given to the repair, replacement or preservation of the 'old bridge?'

RESPONSE:
See Response to Comment 6-8.

Commentor #9
Mark Janzaruk

Comment #9-1
Parking lots adjacent to wetlands invites the inevitable accident like the diesel spill at Squaw Valley.

RESPONSE:
See Response to Comment 6-12.

Comment #9-2
Concerned about keeping the bike route from Lake Mary to Donner Peak open.

RESPONSE:
See Response to Comment 6-1.

Commentor #10
Don Welsh

Comment #10-1
Underestimated the number of people that use the summit area. Many road bikers on Donner Pass Road have not been considered from a safety standpoint.

RESPONSE:
Biking along Donner Pass Road is primarily a non-winter activity and as such is not expected to be significantly impacted by increased winter traffic.

Comment #10-2
Noise impact from snowmaking will affect rock climbers on the summit.

RESPONSE:
The issue of noise from snowmaking was studied in both the Draft EIS and the Final EIS. Noise levels at the Lake Mary residences were found to be below county noise standards. Due to increasing distance to rock climbing activities below Donner Summit, and the barrier effect of ridges and rock outcrops between snowmaking and rock climbing areas, it can be assumed that snowmaking noise will not significantly affect rock climbing areas. In addition, climatic conditions that are favorable to snowmaking, specifically temperatures under 27 degrees F., are generally not considered desirable for rock climbing.

Commentor #11
Gloria Wetzel

Comment #11-1
The proposed Mt. Judah loop trail will put too much traffic on the east side of Mt. Judah and into fragile meadow environments.

RESPONSE:
The Mt. Judah loop trail has been located to avoid direct or indirect impacts to sensitive environments on Mt. Judah, including the east side. The proposed Mt. Judah Loop Trail would leave the PCT north of the project area, climb to the existing Jeep Road near Coldstream Pass, follow the Jeep Road to the Coldstream saddle, climb the northeast face of Mt. Judah, follow the crest to a point just north of Roller Pass and again connect to the PCT. Refer to the map for Alternative 3A included in the Final EIS following page S-13 for loop trail location.

Comment #11-2
Pristine forests on the west side should not be cut.

RESPONSE:
See Response to Comments #8-1 and 6-7. Potential effects of the project on old growth resources were analyzed in the Final EIS. Maximum potential disturbance of old growth stands under Alternative 3 would total 21.5 acres or roughly 12% of the total 186 acres of old growth lands inventoried in the project area. About a third of this disturbance would be subject to disturbance as a result of sanitation logging on private lands. Table IV-8 identifies the potential effects of removal of old growth on the identified old growth values; total acreage changes of old growth stands are relatively small and removal is consistent with LRMP standards and Guidelines. The limited size of the stands affected, the mitigation measures proposed to promote revegetation and maintenance of habitat values, the use of native plants in revegetation and the effectiveness of LRMP designations and Standards and Guidelines in maintaining forest-wide values would avoid any significant impact on biodiversity as a result of the project.

Comment #11-3
Large herds of deer have been seen in the exact location of the proposed expansion yet have been ignored in the EIS.

RESPONSE:
Impacts on deer and other wildlife were extensively analyzed during preparation of the EIS with a summary in the Final EIS on page III-55. The impacts to deer are not expected to be significant. In fact, by maintaining the ski trail clearings in an early successional vegetation state, the browse opportunities will be enhanced.

Commentor #12
Donner Ski Ranch (DSR)—verbal comments provided during post-Final EIS consultation.

Comment #12-1
DSR believes that the "Van Norden" access options were not adequately considered.

RESPONSE:
The "Van Norden" access options have been repeatedly considered during the master planning, EIS preparation, and decision making process. These options were reviewed and discounted by Sno-engineering during early phases of master plan development. These options were considered during preparation of the Draft EIS but were withdrawn from further consideration because they presented more potential for environmental harm than the alternatives considered in detail. Potential impacts associated with these options included potential for growth-inducement, impacts on nordic skiing and other recreation, cultural resource concerns, wildlife effects, and costs required not only to construct the road but also to eliminate traffic/railroad conflicts on Baker Ranch Road. DSR officials have commented that they see the "growth inducing" ramifications of Lake Van Norden road development as a positive feature rather than a potential negative effect.

The "Van Norden" access options were considered again in the preparation of the Final EIS. Again, after reconsideration these alternative access options were considered more environmentally damaging. Refer to Section 9 beginning on page 25 of Chapter II of the Final EIS and Response to Comment #500 beginning on page 30 of Chapter VI of the Final EIS.

Comment #12-2

DSR believes that the proposed Alternative 3A intersection, and development of additional off-street parking south of Donner Pass Road at DSR, will destroy buildable vacant lots. This will, in turn, destroy their vision that some day these lots could be developed into a "village-like" setting.

RESPONSE:

The intersection of the proposed Alternative 3A access road with Donner Pass Road will directly impact two existing lots which will become "unbuildable" (i.e., inadequate building area). A third potentially suitable lot could be adversely impacted should DSR and Sugar Bowl agree that additional off-street parking should be constructed. DSR officials have indicated that they do not believe additional parking is needed.

The implications of use of the subject lots are not considered significant. While DSR may have ideas regarding the development of these parcels, they are not in DSR ownership or control. Development of these parcels would be limited by the small size of the parcels, adjoining railroad right-of-way, rail traffic noise, and off-street parking requirements for any new uses which could be developed.

Comment #12-3

DSR believes that the Forest Service is overstating the environmental impacts associated with the efforts that would be necessary to widen the existing Lake Mary Road from Alpine Skills Institute to its intersection with the proposed Alternative 3A access road.

RESPONSE:

The Response to Comment #2-16 addresses the comparative environmental impacts of the Lake Mary Road and Alternative 3A access options. As noted in the referenced response, the Final EIS does identify notable margins of environmental risk between the two access options. Collectively, the risk of environmental harm is less with the Alternative 3A alignment than with the Lake Mary Road option.